

STATE OF MISSOURI  
DEPARTMENT OF NATURAL RESOURCES

Mel Carnahan, Governor • Stephen M. Mahfood, Director

DIVISION OF ENVIRONMENTAL QUALITY

P.O. Box 176 Jefferson City, MO 65102-0176

NOV 13 2000

*Rec'd*  
*12/1/2000*

The Boeing Company  
P.O. Box 3707 MS 7A-XE  
Seattle, WA 98124-2207

CERTIFIED MAIL: z 321 860 237  
RETURN RECEIPT REQUESTED

Re: Draft Title V Operating Permit – Project No.: 1997-05-003

Dear Sir or Madam:

The Air Pollution Control Program (APCP) has completed the preliminary review of your Title V permit application. A public notice will be placed in the St. Louis Dispatch, St. Louis, MO on November 19, 2000. The conditions and monitoring requirements of the draft permit are open for comment by the public and you until December 19, 2000. Standard permit wording (i.e. General Requirements) is not open for comment, since these provisions are required by law and regulation.

The APCP will accept comments regarding the conditions and monitoring regulations that are postmarked on or before the closing date. Please address comments or recommendations for changes to my attention at:

Operating Permits Unit  
Air Pollution Control Program  
P.O. Box 176  
Jefferson City, MO 65102

A copy of this draft has also been sent to the U.S. EPA's Region VII office in Kansas City for their review. The Region VII office is afforded, by law, oversight authority on any Title V permit which Missouri (or any of the other states in the region) may propose to issue. A public hearing may be held if sufficient interest is expressed by the public.

Should you have any questions, or wish clarification on any items in this draft permit, please feel free to contact me at (573) 751-4817.

Sincerely,

AIR POLLUTION CONTROL PROGRAM



Timothy P. Hines  
Environmental Engineer

TPH:cr

Enclosures  
c: PATS File



# PERMIT TO OPERATE

Under the authority of RSMo 643 and the Federal Clean Air Act the applicant is authorized to operate the air contaminant source(s) described below, in accordance with the laws, rules, and conditions set forth here in.

**Operating Permit Number:**

**Expiration Date:**

**Project Number:** 1997-05-003

**Installation Name and Address**

McDonnell Douglas Corporation a wholly-owned subsidiary of The Boeing Company  
Airport Road and McDonnell Boulevard  
St. Louis, MO 63134  
St. Louis County

**Parent Company's Name and Address**

The Boeing Company  
P.O. Box 3707 MS 7A-XE  
Seattle, WA 98124-2207

**Installation Description:**

McDonnell Douglas Corporation a wholly owned subsidiary of The Boeing Company designs, develops, manufactures, integrates and supports a variety of aerospace and defense products. These include military and commercial aircraft, helicopters, missiles, space launch vehicles and other space systems, and sensing systems.

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Effective Date

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Director or Designee  
Department of Natural Resources

## Table of Contents

<b>I. INSTALLATION DESCRIPTION AND EQUIPMENT LISTING.....</b>	<b>5</b>
EMISSION UNITS WITH LIMITATIONS.....	5
EMISSION UNITS WITHOUT LIMITATIONS.....	15
DOCUMENTS INCORPORATED BY REFERENCE .....	18
<b>II. PLANT WIDE EMISSION LIMITATIONS .....</b>	<b>19</b>
Permit Condition PW001 .....	19
10 CSR 10-6.080.....	19
40 CFR Part 61 Subpart M .....	19
Permit Condition PW002 .....	19
10 CSR 10-6.260.....	19
Permit Condition PW003 .....	20
10 CSR 10-6.220.....	20
Permit Condition PW004 .....	21
10 CSR 10-6.170.....	21
Permit Condition PW005 .....	22
10 CSR 10-5.450.....	22
Permit Condition PW006 .....	22
10 CSR 10-6.250.....	22
<b>III. EMISSION UNIT SPECIFIC EMISSION LIMITATIONS.....</b>	<b>24</b>
EU0010 .....	24
Permit Condition EU0010-001.....	26
10 CSR 10-6.060.....	26
EU0020 .....	27
Permit Condition EU0020-001.....	27
10 CSR 10-5.295.....	27
EU0030 .....	29
Permit Condition EU0030-001.....	29
10 CSR 10-6.075 and 40 CFR Part 63, Subpart GG.....	29
Permit Condition EU0030-002.....	32
10 CSR 10-5.295.....	32
EU0040 .....	34
Permit Condition EU0040-001.....	35
10 CSR 10-5.300 .....	35
Permit Condition EU0040-002.....	37
10 CSR 10-6.060.....	37
EU0050 .....	38
Permit Condition EU0050-001.....	39
10 CSR 10-6.075 and 40 CFR Part 63, Subpart GG.....	39
EU0060 .....	41
Permit Condition EU0060-001.....	45
10 CSR 10-6.075 and 40 CFR Part 63, Subpart GG.....	45
Permit Condition EU0060-002.....	47
10 CSR 10-5.050.....	47
Permit Condition EU0060-003.....	47
10 CSR 10-5.330.....	47
Permit Condition EU0060-004.....	48
10 CSR 10-6.060.....	48
Permit Condition EU0060-005.....	54
10 CSR 10-5.295.....	54
EU0070 .....	55
EU0080 .....	56

Permit Condition EU0080-001.....	56
10 CSR 10-6.075 and 40 CFR Part 63, Subpart GG.....	56
Permit Condition EU0080-002.....	57
10 CSR 10-5.330.....	57
Permit Condition EU0080-003.....	58
10 CSR 10-5.295.....	58
EU0090 .....	59
Permit Condition EU0090-001.....	61
10 CSR 10-6.070 and 40 CFR Part 60 Subpart Dc.....	61
Permit Condition EU0090-002.....	61
10 CSR 10-6.060.....	61
EU0100 .....	63
Permit Condition EU0100-001.....	63
10 CSR 10-6.075 and 40 CFR Part 63, Subpart GG.....	63
EU0110 .....	66
Permit Condition EU0110-001.....	67
10 CSR 10-5.180.....	67
EU0120 .....	67
Permit Condition EU0120-001.....	68
10 CSR 10-6.075 and 40 CFR Part 63, Subpart GG.....	68
EU0130 .....	68
Permit Condition EU0130-001.....	68
EU0140 .....	69
Permit Condition EU0140-001.....	70
10 CSR 10-6.075 and 40 CFR Part 63, Subpart GG.....	70
Permit Condition EU0140-002.....	70
10 CSR 10-5.330.....	70
Permit Condition EU0140-003.....	71
10 CSR 10-6.060.....	71
Permit Condition EU0140-004.....	71
10 CSR 10-5.295.....	71
EU0150 .....	72
Permit Condition EU0150-001.....	72
10 CSR 10-5.050.....	72
EU0160 .....	73
Permit Condition EU0160-001.....	73
10 CSR 10-6.075 and 40 CFR Part 63 Subpart N.....	73
EU0170 .....	75
Permit Condition EU0170-001.....	76
10 CSR 10-5.120.....	76
EU0180 .....	76
Permit Condition EU0180-001.....	77
10 CSR 10-5.220.....	77
Permit Condition EU0180-002.....	77
10 CSR 10-5.220.....	77
Permit Condition EU0180-003.....	78
10 CSR 10-5.220.....	78
Permit Condition EU0180-004.....	78
10 CSR 10-5.443.....	78
EU0190 .....	79
Permit Condition EU0190-001.....	80
10 CSR 10-6.070 and 40 CFR Part 60 Subpart Kb, 60.116(b) .....	80
EU0200 .....	80
Permit Condition EU0200-001.....	81
10 CSR 10-6.075 and 40 CFR Part 63, Subpart T.....	81
Permit Condition EU0200-002.....	81
10 CSR 10-5.300.....	81

Permit Condition EU0200-003.....	82
10 CSR 10-6.060.....	82

**IV. CORE PERMIT REQUIREMENTS .....84**

**V. GENERAL PERMIT REQUIREMENTS .....94**

A. GENERAL MONITORING REQUIREMENTS .....	94
B. GENERAL RECORD KEEPING REQUIREMENTS .....	94
C. GENERAL REPORTING REQUIREMENTS .....	94
D. GENERAL REQUIREMENTS -- 10 CSR 10-6.065(6)(C)1.G. ....	95
E. PERMIT DURATION - 10 CSR 10-6.065(6)(C)1.B, 10-6.065(6)(E)3. ....	96
F. SEVERABILITY CLAUSE - 10 CSR 10-6.065(6)(C)1.....	96
G. INCENTIVE PROGRAMS NOT REQUIRING PERMIT REVISIONS - 10 CSR 10-6.065(6)(C)1.H.....	96
H. CERTIFICATION REQUIREMENTS--10 CSR 10-6.065(6)(C)3.A.....	96
I. .... INSPECTION AND ENTRY – 10 CSR 10-6.065(6)(c)3.B. ....	96
J. PROGRESS REPORTS -- 10 CSR 10-6.065(6)(c)3.D. ....	96
K. COMPLIANCE CERTIFICATION -- 10 CSR 10-6.065(6)(c)3.E. ....	97
L. RISK MANAGEMENT PLANS UNDER SECTION 112(R) 10 CSR 10-6.065(6)(C)1.D.....	97
M. FEDERAL ENFORCEABILITY – 10 CSR 10-6.065(6)(C)2.....	97
N. RESPONSIBLE OFFICIAL – 10 CSR-6.020(2)(R)12.....	97
O. STATEMENT OF BASIS – 10 CSR 10-6.065(6)(E)1.C.....	98

Draft

## **I. Installation Description and Equipment Listing**

McDonnell Douglas Corporation a wholly owned subsidiary of The Boeing Company designs, develops, manufactures, integrates and supports a variety of aerospace and defense products. These include military and commercial aircraft, helicopters, missiles, space launch vehicles and other space systems, and sensing systems.

### **EMISSION UNITS WITH LIMITATIONS**

The following list provides a description of the equipment at this installation which emit air pollutants and which are identified as having unit-specific emission limitations. All the information provided in the table is for informational purposes only. It shall not be construed to create any limits, conditions, or requirements.

Draft

EIQ POINT NO.	EMISSION UNIT NO.	LOCATION						MANUFACTURER	MODEL NUMBER	YEAR IN- STALLED	DESCRIPTION
		BLDG	COLUMN				LEVEL				
			LET1	LET2	NUM1	NUM2					
AS-STL-01	AS-101-01	101	A	B	8	9	1				Vented room (adhesive/sealant application)
AS-STL-01	AS-101-02	101	A	B	8	9	1				Vented room (adhesive/sealant application)
AS-STL-01	AS-101-03	101	A		4		1				Vented hood (adhesives/sealants applications)
AS-STL-01	AS-101-04	101	A		4		1				Two vented hoods (adhesive/sealant applications)
AS-STL-01	AS-STL-01	PW						---	---	---	Plantwide adhesive/sealant usage
BF-STL-02	VS-221-01	221	B		8		1				Vented bench (soldering & solvents)
BF-STL-02	VS-245-01	245	R	T	5		1				Vented solvent storage area
BF-002-03	BF-002-03	2						---	---	---	Handwipe solvent building fugitives in building 2
BF-027-03	BF-027-03	27						---	---	---	Handwipe solvent building fugitives in building 27
BF-029-03	BF-029-03	29						---	---	---	Handwipe solvent building fugitives in building 29 and 29A
BF-048-03	BF-048-03	48						---	---	---	Handwipe solvent building fugitives in building 48
BF-066-03	BF-066-03	66						---	---	---	Handwipe solvent building fugitives in the 60s buildings
BF-101-03	BF-101-03	101						---	---	---	Handwipe solvent building fugitives in building 101
BF-102-03	BF-102-03	102						---	---	---	Handwipe solvent building fugitives in building 102
BF-245-03	BF-245-03	245						---	---	---	Handwipe solvent building fugitives in building 245
BF-STL-01	BF-STL-01	PW						---	---	---	Plantwide Fugitive Painting
BF-STL-02	BF-STL-02	PW						---	---	---	Other miscellaneous plantwide solvent building fugitives
BF-STL-03	BF-STL-03	PW						---	---	---	Handwipe solvent building fugitives in buildings other than buildings with their own point
CC-101-01	CC-101-03	101	D		11		1			1963	Cold cleaner used for tube cleaning
CC-STL-01	CC-101-14	101	A		4		1			1989	Hood venting a drying rack
CC-STL-01	CC-102-01	102	C1		11		1			1977	Cold cleaner for hydraulic equipment

EIQ POINT NO.	EMISSION UNIT NO.	LOCATION						MANUFACTURER	MODEL NUMBER	YEAR IN- STALLED	DESCRIPTION
		BLDG	COLUMN				LEVEL				
			LET1	LET2	NUM1	NUM2					
CC-STL-01	CC-105-01	105					1	Vapo-Kleen	400-1618RFDF (Renovated)	1996	Cold cleaner for electronics only (Moving to 101)
CC-STL-01	CC-221-01	221	B		8		1			1995	Cold cleaner for electronics only
CC-STL-01	CC-STL-01A	PW						---	---	---	Plantwide cold cleaners greater than 1 gal and 1 ft² surface area
BF-STL-02	CC-STL-01B	PW						---	---	---	Plantwide spray gun cleaning
CS-005-01	CS-005-02	5					2	Riley Stoker	P11 #19WW	1984	Coal/natural gas/fuel oil boiler (76.4 MMBTU/hr)
CS-005-01	CS-005-03	5					2	Riley Stoker	P11 #19WW	1984	Coal/natural gas/fuel oil boiler (76.4 MMBTU/hr)
CS-005-01	CS-005-04	5					2	Riley Stoker	P11 #19WW	1984	Coal/natural gas/fuel oil boiler (76.4 MMBTU/hr)
CS-005-05	CS-005-05	5					2	Keeler	BHS-7069 WW HS1431	1967	Natural gas/fuel oil boiler (77.0 MMBTU/hr)
CS-STL-01	CS-025-01	25					NE	Trane	ODF 9000	1977	Natural gas boiler (8.5 MMBTU/hr)
CS-048-01	CS-048-01	48	-A		4		2			1998	Natural gas boiler (25.1 MMBTU/hr)
CS-STL-01	CS-066-01	66	A		2		1			1966	Natural gas boiler (6.3 MMBTU/hr)
CS-STL-01	CS-066-02	66	A		2		1			1966	Natural gas boiler (6.3 MMBTU/hr)
CS-STL-01	CS-066-03	66	A		10		1			1966	Natural gas boiler/fuel oil back-up (6.3 MMBTU/hr)
CS-STL-01	CS-066-04	66	A		10		1			1966	Natural gas boiler/fuel oil back-up (6.3 MMBTU/hr)
CS-101-01	CS-101-01	101	L		1		1	Combustion Engineering		1962	Natural gas/fuel oil boiler (52.0 MMBTU/hr)
CS-101-01	CS-101-02	101	L		1		1	Combustion Engineering		1962	Natural gas/fuel oil boiler (52.0 MMBTU/hr)
CS-101-03	CS-101-03	101	J		3		1	Superior		1957	Natural gas/fuel oil boiler (20.8 MMBTU/hr)
CS-101-03	CS-101-04	101	J		3		1	Superior		1957	Natural gas/fuel oil boiler (20.8 MMBTU/hr)
CS-102-01	CS-102-01	102	F	G	17	19	1	Erie City	1805	1962	Natural gas/fuel oil boiler (79.6 MMBTU/hr)
CS-102-02	CS-102-02	102	E	F	17	19	1	Cleaver Brooks	CB 800 HP	1988	Natural gas/fuel oil boiler (33.476 MMBTU/hr)
CS-102-02	CS-102-03	102	E	F	17	19	1	Superior		1957	Natural gas/fuel oil boiler (25.2 MMBTU/hr)

EIG POINT NO.	EMISSION UNIT NO.	LOCATION						MANUFACTURER	MODEL NUMBER	YEAR IN- STALLED	DESCRIPTION	
		BLDG	COLUMN				LEVEL					
			LET1	LET2	NUM1	NUM2						
CS-110-01	CS-110-01	110					Basemen t	Cleaver Brooks	CB-250	1979	Natural gas boiler/fuel oil back-up (10.461 MMBTU/hr)	
CS-110-01	CS-110-02	110					Basemen t	Cleaver Brooks	CB-250	1979	Natural gas boiler/fuel oil back-up (10.461 MMBTU/hr)	
CS-111-01	CS-111-01	111	O		4		1	Superior	4-5-2506-LGP	1984	Natural gas boiler/fuel oil back-up (16.8 MMBTU/hr)	
CS-111-01	CS-111-02	111	O		4		1	Superior	4-5-2506-LGP	1984	Natural gas boiler/fuel oil back-up (16.8 MMBTU/hr)	
CS-STL-01	CS-111-03	111	O		4		1	Superior	4-5-751-S15-GP	1984	Natural gas boiler/fuel oil back-up (6.3 MMBTU/hr)	
CS-STL-01	CS-221-01	221	D	E	3	4	1	Power Master	4020944	1953	Natural gas boiler (3.3475 MMBTU/hr)	
CS-STL-01	CS-221-02	221	D	E	3	4	1	Power Master	4020944	1953	Natural gas boiler (3.3475 MMBTU/hr)	
CS-STL-01	CS-STL-01A	PW						---	---	---	Plantwide combustion (indirect natural gas)	
CS-STL-01	CS-STL-01C	PW						---	---	---	Plantwide combustion (propane)	
NONE	DP-STL-01	PW						---	---	---	Plantwide mechanical depainting	
PT-101-04	DT-101-01	101	R		30		1			1994	Dip tank used for developing (stoddard solvent)	
NONE	EG-002-01	2	ABB		45		1	Kohler			Diesel emergency generator	
NONE	EG-002-02	2					E					Diesel emergency generator (in shed)
NONE	EG-009-01	9					N			1996	Diesel emergency generator	
NONE	EG-009-02	9					E				Diesel emergency generator (for pump)	
NONE	EG-020-01	20					1				Diesel emergency generator	
NONE	EG-026-01	26					1				Diesel emergency generator (for fire pump)	
NONE	EG-029-01	29	F		2	2	1				Natural gas emergency generator	
NONE	EG-029A-02	29A	M		17		2				Natural gas emergency generator (200HP)	
NONE	EG-033-01	33	B		10		1	Kohler	150ROZJ81		Diesel emergency generator	
NONE	EG-034-01	34	S		22		1	Caterpillar	D318		Diesel emergency generator	
NONE	EG-045-01	45	L		10		1				Diesel emergency generator	
NONE	EG-056-01	56					1				Diesel emergency generator (50 HP)	
NONE	EG-064-01	64	N		6		2				Natural gas emergency generator (250 HP @ 1800 RPM)	
NONE	EG-066-01	66	D		2		1				Natural gas emergency generator (250 HP)	

EIQ POINT NO.	EMISSION UNIT NO.	LOCATION						MANUFACTURER	MODEL NUMBER	YEAR IN- STALLED	DESCRIPTION
		BLDG	COLUMN				LEVEL				
			LET1	LET2	NUM1	NUM2					
NONE	EG-066-02	66					S				Diesel emergency generator (for fire pump)
NONE	EG-067-01	67					W				Diesel emergency generator
NONE	EG-101-01	101	J		3		1				Diesel emergency generator
NONE	EG-101A-01	101A	F		1		1				Natural gas emergency generator
NONE	EG-102-01	102	F	G	17	19	1				Diesel emergency generator
NONE	EG-103-01	103	B		7		1				Diesel emergency generator
NONE	EG-106-01	106	B		5		1				Diesel emergency generator
NONE	EG-107-01	107	B		6		1				Diesel emergency generator
NONE	EG-110-01	110					Base.				Natural gas emergency generator
NONE	EG-111-01	111	I		3		1				Diesel emergency generator
NONE	EG-122-01	122					1				Diesel emergency generator
NONE	EG-220-01	220	BB		18		1	Kohler	150ROZJ81		Diesel emergency generator
NONE	EG-HQ-01	100	A		11		1	Δ			Diesel emergency generator
NONE	GB-027-02	27	Q	U	17	21	1	Vacu-Blast		1968	Walk-in grit blaster
NONE	HW-STL-01	PW						---	---	---	Plantwide handling of hazardous waste
NONE	IT-027-01T	27	FF	GG	30	34	1				Immersion tank 1 in the titanium line
PT-027-06	IT-027-02A	27	DD	FF	30	34	1			1973	Immersion tank 2 in the aluminum line
PT-027-08A	IT-027-02P	27	V	Z	32	34	1				Immersion tank 2 in the plating line
NONE	IT-027-02T	27	FF	GG	30	34	1				Immersion tank 2 in the titanium line
PT-027-08A	IT-027-03P	27	V	Z	32	34	1				Immersion tank 3 in the plating line
PT-027-08A	IT-027-04P	27	V	Z	32	34	1				Immersion tank 4 in the plating line
NONE	IT-027-05T	27	FF	GG	30	34	1				Immersion tank 5 in the titanium line
PT-027-12	IT-027-06A	27	DD	FF	30	34	1				Immersion tank 6 in the aluminum line
PT-027-02	IT-027-06T	27	FF	GG	30	34	1				Immersion tank 6 in the titanium line
NONE	IT-027-07T	27	FF	GG	30	34	1				Immersion tank 7 in the titanium line
PT-027-05	IT-027-08A	27	DD	FF	30	34	1			1961	Immersion tank 8 in the aluminum line
PT-027-01	IT-027-08T	27	FF	GG	30	34	1				Immersion tank 8 in the titanium line
PT-027-09A	IT-027-09P	27	V	Z	32	34	1				Immersion tank 9 in the plating line
PT-027-01	IT-027-09T	27	FF	GG	30	34	1				Immersion tank 9 in the titanium line
PT-027-08B	IT-027-10P	27	V	Z	32	34	1				Immersion tank 10 in the plating line
PT-027-05	IT-027-11A	27	DD	FF	30	34	1			1961	Immersion tank 11 in the aluminum line
NONE	IT-027-11T	27	FF	GG	30	34	1				Immersion tank 11 in the titanium line
PT-027-03	IT-027-12A	27	DD	FF	30	34	1			1969	Immersion tank 12 in the aluminum line
PT-027-08B	IT-027-12P	27	V	Z	32	34	1				Immersion tank 12 in the plating line

EIG POINT NO.	EMISSION UNIT NO.	LOCATION						MANUFACTURER	MODEL NUMBER	YEAR IN- STALLED	DESCRIPTION
		BLDG	COLUMN				LEVEL				
			LET1	LET2	NUM1	NUM2					
PT-027-03	IT-027-13A	27	DD	FF	30	34	1			1969	Immersion tank 13 in the aluminum line
NONE	IT-027-17P	27	V	Z	32	34	1				Immersion tank 17 in the plating line
PT-027-08B	IT-027-22P	27	V	Z	32	34	1				Immersion tank 22 in the plating line
NONE	IT-027-24P	27	V	Z	32	34	1				Immersion tank 24 in the plating line
PT-027-08B	IT-027-27P	27	V	Z	32	34	1				Immersion tank 27A in the plating line
PT-027-10	IT-027-28P	27	V	Z	32	34	1				Immersion tank 28 in the plating line
NONE	IT-027-30P	27	V	Z	32	34	1				Immersion tank 30 in the plating line
NONE	IT-027-32P	27	V	Z	32	34	1				Immersion tank 32 in the plating line
PT-027-10	IT-027-33P	27	V	Z	32	34	1				Immersion tank 33 in the plating line
PT-027-10	IT-027-34P	27	V	Z	32	34	1				Immersion tank 34 in the plating line
PT-027-10	IT-027-35P	27	V	Z	32	34	1				Immersion tank 35 in the plating line
NONE	IT-027-36P	27	V	Z	32	34	1				Immersion tank 36 in the plating line
NONE	IT-027-37P	27	V	Z	32	34	1				Immersion tank 37 in the plating line
PT-027-10	IT-027-38P	27	V	Z	32	34	1				Immersion tank 38 in the plating line
NONE	IT-027-43P	27	V	Z	32	34	1				Immersion tank 43 in the plating line
NONE	IT-027-44P	27	V	Z	32	34	1				Immersion tank 44 in the plating line
NONE	IT-027-46P	27	V	Z	32	34	1				Immersion tank 46 in the plating line
NONE	IT-027-47P	27	V	Z	32	34	1				Immersion tank 47 in the plating line
PT-027-09B	IT-027-49P	27	V	Z	32	34	1				Immersion tank 49 in the plating line
NONE	IT-027-50P	27	V	Z	32	34	1				Immersion tank 50 in the plating line
NONE	IT-027-EA	27	DD	FF	30	34	1				Immersion tank E in the aluminum line
NONE	IT-027-GA	27	DD	FF	30	34	1				Immersion tank G in the aluminum line
NONE	IT-027-HA	27	DD	FF	30	34	1				Immersion tank H in the aluminum line
NONE	IT-027-JA	27	DD	FF	30	34	1			1979	Immersion tank J in the aluminum line
NONE	IT-027-KA	27	DD	FF	30	34	1			1979	Immersion tank K in the aluminum line
PT-027-07	IT-027-MA	27	DD	FF	30	34	1			1969	Immersion tank M in the aluminum line
PT-029A-01	IT-029A-02	29A	B	C	12		1			1997	Immersion tank 2 in the tank line
PT-029A-01	IT-029A-03	29A	B	C	12		1			1997	Immersion tank 3 in the tank line
PT-029A-01	IT-029A-04	29A	B	C	12		1			1997	Immersion tank 4 in the tank line
PT-029A-01	IT-029A-05	29A	B	C	12		1			1997	Immersion tank 5 in the tank line
PT-029A-01	IT-029A-06	29A	B	C	12		1			1997	Immersion tank 6 in the tank line
PT-029A-01	IT-029A-10	29A	B	C	12		1			1997	Immersion tank 10 in the tank line
PT-029A-01	IT-029A-11	29A	B	C	12		1			1997	Immersion tank 11 in the tank line
PT-029A-01	IT-029A-14	29A	B	C	12		1			1997	Immersion tank 14 in the tank line
PT-029A-01	IT-029A-15	29A	B	C	12		1			1997	Immersion tank 15 in the tank line

EIQ POINT NO.	EMISSION UNIT NO.	LOCATION						MANUFACTURER	MODEL NUMBER	YEAR IN- STALLED	DESCRIPTION
		BLDG	COLUMN				LEVEL				
			LET1	LET2	NUM1	NUM2					
PT-029A-01	IT-029A-16	29A	B	C	12		1			1997	Immersion tank 16 in the tank line
PT-029A-01	IT-029A-17	29A	B	C	12		1			1997	Immersion tank 17 in the tank line
PT-029A-01	IT-029A-18	29A	B	C	12		1			1997	Immersion tank 18 in the tank line
NONE	IT-051-01A	52	A	B	4	5	1			1963	Immersion tank 1 in the aluminum line
NONE	IT-051-01T	52	A	B	6		1			1963	Immersion tank 1 in the titanium line
NONE	IT-051-02T	52	A	B	6		1			1963	Immersion tank 2 in the titanium line
PT-051-02	IT-051-03T	52	A	B	6		1			1963	Immersion tank 3 in the titanium line
NONE	IT-051-04A	52	A	B	4	5	1			1963	Immersion tank 4 in the aluminum line
NONE	IT-051-04T	52	A	B	6		1			1963	Immersion tank 4 in the titanium line
PT-051-02	IT-051-05T	52	A	B	6		1			1963	Immersion tank 5 in the titanium line
NONE	IT-051-06A	52	A	B	4	5	1			1963	Immersion tank 6 in the aluminum line
PT-101-04	IT-101-01N	101	R		30		1			1994	Immersion tank (Desmut) in the nameplate line
PT-101-04	IT-101-02N	101	R		30		1			1994	Immersion tank (Strip) in the nameplate line
PT-101-04	IT-101-03N	101	R		30		1			1994	Immersion tank (Water) in the nameplate line
PT-101-04	IT-101-04N	101	R		30		1			1994	Immersion tanks (hand tanks) in the nameplate line
PT-101-01	IT-101-05A	101	A	B	30	36	1			1984	Immersion tank 5 in the aluminum line
PT-101-02	IT-101-06A	101	A	B	30	36	1			1984	Immersion tank 6 in the aluminum line
PT-101-03	IT-101-07A	101	A	B	30	36	1			1984	Immersion tank 7 in the aluminum line
CL-048-01	MB-048-01	48	A	G	5	6	1			1986	Vented paint mixing hoods (2)
CL-063-01	MB-063-01	63	F		3		1			1986	Vented paint mixing rooms (2)
MC-STL-01	MC-STL-01	PW									Plantwide chemical depainting
ML-051-01	ML-051-01	51	A	C	7	15	1			1997	Large waterbased maskant line
NONE	ML-051-02	51	A		6	8	1				Small waterbased maskant line
MO-029-A	MO-029-01	29	I		1		1			1981	Lead melting furnace
MO-029-A	MO-029-02	29	I		1		1			1986	Lead melting furnace
NONE	MS-027-04	27					Shelter				Hazardous waste shelter
MS-027-06	MS-027-06	27	C		34		BASE MENT			1997	Cutting fluid concentrator
DB-027-01	PI-027-01	27	BB		23	25	1			1976	Penetrant inspection booth
DB-027-01	PI-027-02	27	BB		23	25	1			1976	Penetrant inspection booth
CL-002-01	SB-002-01	2	B		5		2			1990	Large spray booth (production parts)
AS-STL-01	SB-002-04	2	A		26		2				Booth for various activities (adhesive/sealants)

EIQ POINT NO.	EMISSION UNIT NO.	LOCATION						MANUFACTURER	MODEL NUMBER	YEAR IN- STALLED	DESCRIPTION
		BLDG	COLUMN				LEVEL				
			LET1	LET2	NUM1	NUM2					
CL-002-02	SB-002-06	2	F		22		2	DeVilbiss	SDF6240	1980	Spray booth (maintenance) (sanding)
CL-022-01	SB-022-01	22	C		7		1	Binks	DTSP-4373	1958	Spray booth (vehicle maintenance)
CL-027-01	SB-027-01	27	Z	DD	30	34	1	DeVilbiss		1945	Paint booth (mostly production) (some sanding)
CL-027-01	SB-027-02	27	Z	DD	30	34	1	DeVilbiss		1943	Paint booth (mostly production) (some sanding)
CL-027-01	SB-027-03	27	Z	DD	30	34	1	DeVilbiss		1943	Paint booth (mostly production) (some sanding)
CL-027-01	SB-027-04	27	Z	DD	30	34	1	DeVilbiss		1943	Paint booth (mostly production) (some sanding)
CL-027-01	SB-027-05	27	Z	DD	30	34	1	DeVilbiss		1943	Paint booth (mostly production) (some sanding)
CL-029-01	SB-029-01	29A	A	D	11		1	DeVilbiss		1997	Adhesive bonding coating line
CL-029-02	SB-029A-02	29A	A	B	18	19	1			1997	Spray booth (mostly QA/QC) (possible production)
CL-048-01	SB-048-01	48	A	G	1	10	1	DeVilbiss		1967	Paint booth (aerospace production)
CL-048-01	SB-048-02	48	A	G	1	10	1	DeVilbiss		1967	Paint booth (aerospace production)
CL-048-01	SB-048-03	48	A	G	1	10	1	DeVilbiss		1967	Paint booth (aerospace production)
CL-048-01	SB-048-04	48	A	G	1	10	1	DeVilbiss		1967	Paint booth (aerospace production)
CL-048-01	SB-048-05	48	A	G	1	10	1			1997	Paint booth (aerospace production)
CL-048-01	SB-048-06	48	A	G	1	10	1			1997	Paint booth (aerospace production)
ML-051-01	SB-051-01	51	A		7		1			1997	Maskant spray booth
CL-060-01	SB-060-01	60	T		9		1			1990	Spray booth (cans of primer)(research and development)
CL-063-01	SB-063-01	63	F		2		1			1986	Spray booth (paint & others)(aerospace production)
CL-066-01	SB-066-01	66	H		7		1			1984	Spray booth (aerospace production) (painting and sanding)
CL-066-01	SB-066-02	66	J		10		1			1984	Spray Booth (research and development)
CL-101-02	SB-101-02	101	G		1		1			1990	Spray booth (aerospace production) (painting and sanding)
CL-101-03	SB-101-04	101D	Rm 105				1	DeVilbiss		1994	Spray booth (research and development)
CL-101-03	SB-101-06	101D	Rm 101				1			1986	Spray booth (mock-up & tooling) (could be used for production)
NONE	SB-101-10	101D	Rm 205				2	Metco		1988	Spray Booth (Plasma spray coater) (research and development)

EIQ POINT NO.	EMISSION UNIT NO.	LOCATION						MANUFACTURER	MODEL NUMBER	YEAR IN- STALLED	DESCRIPTION
		BLDG	COLUMN				LEVEL				
			LET1	LET2	NUM1	NUM2					
CL-101-01	SB-101-25	101	A		25	29	1	DeVilbiss		1963	Spray booth (aerospace production) (painting and sanding)
CL-101-01	SB-101-26	101	A		25	29	1	DeVilbiss		1963	Spray booth (aerospace production) (painting and sanding)
CL-101-01	SB-101-27	101	A		25	29	1	DeVilbiss		1963	Spray booth (aerospace production) (painting and sanding)
AS-STL-01	SB-101-29	101	Q		54		1			1988	Spray booth (sealants and adhesives)
CL-101-01	SB-101-30	101	A		25	29	1	DeVilbiss		1963	Spray booth (aerospace production) (painting and sanding)
CL-101-02	SB-101-33	101	G		1		1	Binks		1961	Spray booth (aerospace production) (painting and sanding)
NONE	SB-101-34	101	B		18		1				Spray Booth (Arc Spray)
CL-101-03	SB-101-35	101D	Rm 216				1			1986	Spray booth (robotic & hand applied) (research and development) (could be used for production)
CL-101-01	SB-101-39	101	A		25	29	1	DeVilbiss	SL-1360	1964	Spray booth (aerospace production) (painting and sanding)
CL-101-02	SB-101-40	101	F		1		1	DeVilbiss		1961	Spray booth (aerospace production) (painting and sanding)
CL-101-02	SB-101-40A	101	F		1		1	DeVilbiss		1961	Spray booth (aerospace production) (painting and sanding)
CL-101-03	SB-101-41	101D	Rm 111				1	Binks		1987	Spray booth (research and development) (could be used for production)
CL-101-03	SB-101-43	101D	Rm 208				2			1986	Spray booth (robotic & hand applied) (research and development)
CL-101-01	SB-101-44	101	R		30		1	Binks		1994	Spray booth (developers: ex: KPR Resist) (not primer or topcoat)
CL-101-03	SB-101-45	101	P1		30	33	1			1996	Robotic Sprayer (research and development)
CL-102-01	SB-102-01	102	H		15		3	Binks		1983	Bench spray booth (research & development)
AS-STL-01	SB-102-02	102	H		13	15	3	Binks		1983	Bench spray booth (lab) (epoxy spray) (research and development)
CL-102-01	SB-102-03	102	C		16		1	DeVilbiss	XDF 6224	1984	Paint booth (aerospace)(mostly research and development) (some aerospace production)
CL-245-02	SB-245-02	245	C		29		1			1989	Paint booth (maintenance)

EIQ POINT NO.	EMISSION UNIT NO.	LOCATION						MANUFACTURER	MODEL NUMBER	YEAR IN- STALLED	DESCRIPTION
		BLDG	COLUMN				LEVEL				
			LET1	LET2	NUM1	NUM2					
CL-248-01	SB-248-01	248	Rm 134				1			1990	Paint booth (mock-up)(research and development)
SP-005-01	SP-005-01	5					E	---	---	---	Coal storage pile
NONE	ST-005-20	5					E				Fuel oil # 2 UST (20,000 gal)
NONE	ST-005-21	5					E				Fuel oil # 2 UST (20,000 gal)
ST-STL-01	ST-022-22	22					E				Gasoline UST (8,000 gal)
ST-STL-01	ST-022-25	22					E				Gasoline UST (10,000 gal)
ST-STL-01	ST-041-20	41					W				Gasoline UST (8,000 gal)
NONE	ST-041-21	41					W				Jet fuel UST #1 (30,000 gal)A-41
NONE	ST-041-22	41					W				Jet fuel UST #2 (30,000 gal) B-41
NONE	ST-041-23	41					W				Jet fuel UST #3 (30,000 gal) C-41
NONE	ST-041-24	41					W				Jet fuel UST #4 (30,000 gal) D-41
ST-STL-01	ST-066-02	66					SE				Gasoline storage tank (~560 gal)
NONE	ST-102-21	102					E				Fuel oil #2 UST (20,000 gal)
ST-STL-01	ST-102B-01	102B					E				Gasoline storage tank (298 gal)
NONE	ST-110-20	110					SE				Fuel oil #2 UST (15,000 gal)
NONE	ST-111-01	111					N				Fuel oil #2 underground storage tank (12,000 gal)
ST-120-01	ST-120-01	120					S				Vertical fuel oil #2 (107,000 gal)
ST-120-02	ST-120-02	120					S				Vertical fuel oil #2 (50,000 gal)
ST-STL-01	ST-121-01	121					NW				Gasoline tank (550 gal)
ST-STL-01	ST-220-01	220					W				Gasoline tank (~300 gal)
ST-STL-01	ST-245-02	245					SE				Gasoline tank (301 gal)
VD-027-01	VD-027-01	27	U		30		1			1998	Vapor degreaser (trichloroethylene)
VD-029-01	VD-029-01	29A	B		12		1	Baron-Blakeslee		1997	Vapor degreaser (trichloroethylene)
VD-042-01	VD-042-01	42	D	E	7		4			1982	Vapor degreaser (Vertrel SMT) PHILLIPS
VD-101-01	VD-101-01	101	D	E	6	17	1			1982	Vapor degreaser (trichloroethylene)
VD-101-02	VD-101D-04	101D	Rm 205				2			1995	Vapor degreaser (trichloroethylene)
VD-102-01	VD-102-01	102	A		13	15	1			1982	Vapor degreaser (trichloroethylene)

### EMISSION UNITS WITHOUT LIMITATIONS

The following list provides a description of the equipment that does not have unit specific limitations at the time of permit issuance. All of the information provided in the table is for informational purposes only. It shall not be construed to create any limits, conditions or requirements.

EIQ POINT NO.	EMISSION UNIT NO.	LOCATION						MANUFACTURER	MODEL NUMBER	YEAR IN STALLED	DESCRIPTION
		BLDG	COLUMN				LEVEL				
			LET1	LET2	NUM1	NUM2					
CC-STL-01	CC-245-04	245	C		29		1				Solvent bath used for cleaning paint brushes
CC-STL-01	CC-STL-01C	PW						---	---	---	Plantwide cleaning units less than 1 gal or 1 ft² surface area
CS-027-01	CS-027-01	27	Z	DD	30	34	1				Natural gas Make-Up air heater (12.2 MMBTU/hr)
CS-027-01	CS-027-02	27	Z	DD	30	34	1				Natural gas Make-Up air heater (12.2 MMBTU/hr)
CS-027-01	CS-027-03	27	Z	DD	30	34	1				Natural gas Make-Up air heater (12.2 MMBTU/hr)
CS-027-01	CS-027-04	27	Z	DD	30	34	1				Natural gas Make-Up air heater (12.2 MMBTU/hr)
CS-027-01	CS-027-05	27	Z	DD	30	34	1				Natural gas Make-Up air heater (12.2 MMBTU/hr)
CS-027-01	CS-027-06	27	Z	DD	30	34	1				Natural gas Make-Up air heater (12.2 MMBTU/hr)
CS-STL-01	CS-STL-01B	PW						---	---	---	Plantwide combustion (direct natural gas)
CT-STL-01	CT-STL-01A	PW						---	---	---	Plantwide forced draft cooling towers
CT-STL-01	CT-STL-01B	PW						---	---	---	Plantwide spray ponds
CU-STL-01	CU-STL-01A	PW						---	---	---	Plantwide composite emissions
FA-005-01	FA-005-01	5					N				Fly Ash Collection System
NONE	IT-027-01A	27	DD	FF	30	34	1				Immersion tank 1 in the aluminum line
PT-027-04	IT-027-04A	27	DD	FF	30	34	1				Immersion tank 4 in the aluminum line
NONE	IT-027-14P	27	V	Z	32	34	1				Immersion tank 14 in the plating line
NONE	IT-027-15P	27	V	Z	32	34	1				Immersion tank 15 in the plating line
PT-027-11	IT-027-18A	27	DD	FF	30	34	1				Immersion tank 18 in the aluminum line
NONE	IT-027-20A	27	DD	FF	30	34	1				Immersion tank 20 in the aluminum line
NONE	IT-027-40P	27	V	Z	32	34	1				Immersion tank 40 in the plating line

EIQ POINT NO.	EMISSION UNIT NO.	LOCATION						MANUFACTURER	MODEL NUMBER	YEAR IN STALLED	DESCRIPTION
		BLDG	COLUMN				LEVEL				
			LET1	LET2	NUM1	NUM2					
NONE	IT-027-51P	27	V	Z	32	34	1				Immersion tank 51 in the plating line
PT-051-01	IT-051-03A	52	A	B	4	5	1				Immersion tank 3 in the aluminum line
NONE	IT-101-01A	101	A	B	30	36	1				Immersion tank 1 in the aluminum line
PT-101-04	IT-101-01P	101	R		36		1				Immersion tank (1) in the passivate line
PT-101-04	IT-101-02P	101	R		36		1				Immersion tank (2) in the passivate line
PT-101-04	IT-101-04P	101	R		36		1				Immersion tank (4) in the passivate line
PT-101-04	IT-101-07P	101	R		36		1				Immersion tank (7) in the passivate line
NONE	IT-101-A1A	101	A	B	30	36	1				Immersion tank A1 in the aluminum line
NONE	IT-101-A2A	101	A	B	30	36	1				Immersion tank A2 in the aluminum line
NONE	IT-101-AA	101	A	B	30	36	1				Immersion tank A in the aluminum line
PT-101-03	IT-101-HA	101	A	B	30	36	1				Immersion tank H in the aluminum line
NONE	LH-STL-01	PW						---	---	---	Plantwide lab hoods
NONE	LS-102-01	102	F		5	8	1				HF/DF laser used for testing
CL-002-01	MB-002-01	2	B		1		2				Vented paint mixing room
CL-002-02	MB-002-02	2	F	G	23		2				Vented paint mixing room
CL-101-03	MB-101-01	101	P	Q	30	33	1				Vented hood for paint mixing
CL-101-03	MB-101-02	101	P2		30		1				Vented paint mixing hood
CL-101-01	MB-120-01	120	S Wall				1				Vented chemical mixing/dispensing room
CL-245-02	MB-245-01	245	C		29		1				Vented paint mixing room
MP-STL-01	MP-STL-01	PW						---	---	---	Plantwide maintenance painting
CU-STL-01	MS-029A-04	029A	H		17		1				Fiber placement machine for composites
NONE	MS-111-02	111	H/7	M	3	7	1				Scrubbers (3) to control lab equipment
NONE	MS-STL-01	PW						---	---	---	Plantwide hand held equipment (such as sanders, drills, riveters, ...)
NONE	MT-245-02	245	F		9		1				Tank containing concentrated cutting fluid
NONE	MT-245-03	245	F		9		1				Cutting fluid mix tank
HT-245-01	OV-245-04	245	R	N	23	24	1				Electric austenizing furnace (Endothermic gas atmosphere)
HT-245-01	OV-245-05	245	R	N	23	24	1				Electric austenizing furnace (Endothermic gas atmosphere)
HT-245-01	OV-245-06	245	R		24		1				Endothermic gas generator
Various	OV-STL-01	PW						---	---	---	Plantwide electric curing ovens
Various	OV-STL-02	PW						---	---	---	Plantwide electric burn-off ovens
NONE	PE-STL-01	PW						---	---	---	Plantwide particulate emitting sources not specifically listed

EIQ POINT NO.	EMISSION UNIT NO.	LOCATION						MANUFACTURER	MODEL NUMBER	YEAR IN STALLED	DESCRIPTION
		BLDG	COLUMN				LEVEL				
			LET1	LET2	NUM1	NUM2					
NONE	PT-101-06	101	U		54		1				Process tank line (small line)
NONE	PT-101D-05	101D	Rm 212	Rm 214	Rm 216		2				Process tank line (R&D)
NONE	PT-102-01	102	A		13		1				Process tank line (small line)
NONE	PT-102-02	102	H		13	15	3				Process tank line (R&D/ QA/QC)
NONE	PT-248-01	248	A	K	3	7	1				Process tank lines (R&D)
RF-STL-01	RF-STL-01	PW						---	---	---	Plantwide gasoline refueling
RF-STL-02	RF-STL-02	PW						---	---	---	Plantwide aircraft refueling
NONE	SB-002-02	2	FFG	G	23	25	1				Booth for fan maintenance (cleaning not painting)
CL-002-02	SB-002-03	2	F		23		2				Bench Spray booth (aerosol cans)
MP-STL-01	SB-002-05	2	AAB		36		1				Spray booth (maintenance) (aerosol cans)
BF-STL-02	SB-042-01	42	D	E	7	8	4				Vented hood (Electronics coatings) (brushed or dipped not sprayed)
NONE	SB-042-02	42	D	E	7	8	4				Vented hood (Laminar Bench) (soldering)
NONE	SB-042-03	42	D		1		3				Vented hood (soldering)
CL-101-01	SB-101-01	101	N		30		1				Spray booth (lockfoam operations)
CL-101-01	SB-101-03	101	P		30		1				Lab hood for conformal coating of parts
CL-101-01	SB-101-07	101	N	P	30		1				Bench spray booth (4 sections) (lockfoam operations) (no painting)
CL-101-01	SB-101-46	101	Q		54		2				Spray booth (Aerosol Cans)
NONE	SB-107-01	107	B		2		1				Hood used for hydraulic testing
CL-245-01	SB-245-05	245	A		22		1				Small paint booth (Aerosol cans and grinding)
CL-245-01	SB-245-03	245	R	T	4		1				Vented painting area (tooling only, possible maintenance)
NONE	SC-STL-01	PW						---	---	---	Plantwide salt corrosion chambers
NONE	ST-STL-D	PW						---	---	---	Plantwide Diesel/Fuel Oil/Jet Fuel Storage Tanks (<=10,000 gallons)
NONE	VR-STL-01	PW						---	---	---	Plantwide Diesel Refueling
WE-STL-01	WE-STL-01	PW						---	---	---	Plantwide welding

**DOCUMENTS INCORPORATED BY REFERENCE**

These documents have been incorporated by reference into this permit.

- 1) None

Draft

## II. Plant Wide Emission Limitations

The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements.

### I) Federally Enforceable Requirements

#### Permit Condition PW001

10 CSR 10-6.080

##### Emission Standards for Hazardous Air Pollutants

40 CFR Part 61 Subpart M

##### National Emission Standard for Asbestos

###### Emission Limitations:

- (1) Before engaging in any renovation or demolition activity that would disturb more than 260 linear feet of regulated asbestos containing material ("RACM") on pipes or 160 square feet of RACM on other building components, the permittee shall hire a certified asbestos abatement contractor to abate the RACM in the part of the facility that will be disturbed by the renovation or demolition activity.
- (2) Prior to commencement of any demolition or renovation activity at the facility, the permittee shall inspect the part of the facility that will be affected by the demolition or renovation activity for RACM.
- (3) The permittee shall require the certified asbestos abatement contractor hired to abate RACM in accordance with subsection (1) above to comply with the following:
  - (a) the work practices for asbestos emission control pursuant to 61.145(c);
  - (b) the work practices and procedures for waste disposal pursuant to 61.150; and
  - (c) the work practices for air cleaning pursuant to 61.152.

###### Record Keeping:

The permittee or its qualified asbestos abatement contractor shall keep records as required by 40 CFR 61.145(c)(7), 61.145(c)(8) and 61.150(d)(1).

###### Monitoring:

None

###### Reporting:

- (1) Notices required by 61.145(b) shall be submitted by the Missouri Certified Asbestos Abatement contractor or the permittee.
- (2) These notices do not need to be certified by a responsible official.

#### Permit Condition PW002

10 CSR 10-6.260

##### Restriction of Emission of Sulfur Compounds

###### Emission Limitations:

- (1) Section (4)
  - (a) No person shall cause or permit the emission of sulfur compounds from any source which causes or contributes to concentrations exceeding those in 10 CSR 10-6.010, *Ambient Air Quality Standards*.
- (2) Section (5)

- (a) Fuel oil and coal burned at this facility must have a sulfur content of no greater than 2% from October through March and no greater than 4% for the rest of the year.
- (b) Propane and natural gas combustion have no requirements placed on them in this section.

**Record Keeping:**

The permittee shall maintain a record of the sulfur content of the fuel oil and coal as purchased. (ex. bill of lading, MSDS, or other)

**Monitoring:**

None

**Reporting:**

The permittee shall report to the St. Louis County Health Department Air Pollution Control Section at 111 S. Meramec Ave., Clayton, MO 63105 and the Missouri Department of Natural Resources Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, no later than thirty (30) days after the discovery of an exceedance of the sulfur content limit established under Emission Limitations (2)(a).

<b>Permit Condition PW003</b>
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10 CSR 10-6.220
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<b>Restriction of Emission of Visible Air Contaminants</b>
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**Emission Limitations:**

No owner or other person shall cause or permit to be discharged into the atmosphere from any single new or existing source of emission, any visible emissions greater than

- 20% opacity, with the exception that;
- 40% opacity shall be allowed for a period not aggregating more than one six-minute period in any sixty (60) minutes.

**Monitoring:**

- The permittee shall conduct opacity measurements on this emission unit using one of the following four (4) methods:
  1. Qualified observer in accordance with 10 CSR 10-6.030 (9), Reference Method 9 - Visual Determination of the Opacity of Emissions from Stationary Sources;
  2. Qualified observer in accordance with proposed Test Method 203A - Visual Determination of the Opacity of Emissions from Stationary Sources for Time Averaged Regulations;
  3. Qualified observer in accordance with proposed Method 203B - Visual Determination of the Opacity of Emissions from Stationary Sources for Time-Exception Regulations; or
  4. Continuous Opacity Monitoring System that complies with and is installed, calibrated, maintained and operated in accordance with proposed Test Method 203 - Visual Determination of the Opacity of Emissions from Stationary Sources by Continuous Opacity Monitoring Systems.
- The following monitoring schedule must be maintained:

1. Weekly observations shall be conducted for a minimum of eight (8) consecutive weeks after permit issuance. Should no violation of this regulation be observed during this period then-
  2. Observations must be made once every two weeks for a period of eight (8) weeks. If a violation is noted, monitoring reverts to weekly. Should no violation of this regulation be observed during this period then-
  3. Observations must be made once per month. If a violation is noted, monitoring reverts to weekly.
- If the source reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner from the initial monitoring frequency.

**Record Keeping:**

- The permittee shall maintain monitoring records (see Attachment B) noting:
  1. Whether any air emissions (except for water vapor) were visible from the emission units,
  2. All emission units from which visible emissions occurred, and
  3. Whether the visible emissions were normal for the process.
- The permittee shall maintain records of any equipment malfunctions.

**Reporting:**

The permittee shall report to the St. Louis County Health Department Air Pollution Control Section at 111 S. Meramec Ave., Clayton, MO 63105 and the Missouri Department of Natural Resources Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, no later than thirty (30) days after the discovery of an exceedance of the opacity limit established under Emission Limitations.

**Permit Condition PW004**

10 CSR 10-6.170

**Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin**

**Emission Limitation:**

- (1) No person may cause or allow to occur any handling, transporting or storing of any material; construction, repair, cleaning or demolition of a building or its appurtenances; construction or use of a road, driveway or open area; or operation of a commercial or industrial installation without applying reasonable measures as may be required to prevent, or in a manner which allows or may allow, fugitive particulate matter to go beyond the premises of origin in quantities that the particulate matter:
  - (a) Remains visible in the ambient air beyond the property line of origin; or
  - (b) May be found on surfaces beyond the property line of origin. The nature or origin of the particulate matter shall be determined by microscopy or other technique proven to be equally accurate and approved by the director.

**Record Keeping:**

- (1) Monthly
  - (a) The permittee shall maintain records of the visual inspections.

**Monitoring:**

- (1) Monthly

- (a) The permittee shall conduct visual observations.
- (b) Absence of visible emissions will demonstrate compliance.

**Reporting:**

The permittee shall report to the St. Louis County Health Department Air Pollution Control Section at 111 S. Meramec Ave., Clayton, MO 63105 and the Missouri Department of Natural Resources Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, no later than thirty (30) days after the discovery of any fugitive particulate matter being caused or allowed to go beyond the premises of origin, without applying reasonable control measures, in quantities that the particulate matter remains visible in the ambient air or is found on surfaces.

**II) State/Local Only Enforceable Requirements**

<b>Permit Condition PW005</b>
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10 CSR 10-5.450
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<b>Control of VOC Emissions from Traffic Coatings</b>
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**Emission Limitations:**

The VOC content of traffic coatings may not exceed 1.26 lbs/gallon.

**Record Keeping:**

Records (such as MSDS, purchasing records,...) showing the VOC content of the traffic coatings used will be kept.

**Monitoring:**

None

**Reporting:**

The permittee shall report to the St. Louis County Health Department Air Pollution Control Section, 111 South Meramec, Clayton, MO, 63105 no later than thirty (30) days after the discovery of any use of traffic coating that exceed the 1.26 lbs/gallons VOC content limit.

<b>Permit Condition PW006</b>
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10 CSR 10-6.250
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<b>Asbestos Abatement Projects - Certification, Accreditation and Business Exemption Requirements</b>
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**Emission Limitations:**

- (1) The permittee shall conduct all asbestos abatement projects within the procedures established for certification and accreditation by 10 CSR 10-6.250.
  - (a) An individual must receive certification from the department before that individual participates in an asbestos abatement project operating in Missouri according to section (3). This certification is annually renewable.
  - (b) Certification as an AHERA inspector, AHERA management planner and AHERA project designer apply to AHERA-related projects.

**Record Keeping:**

Any appropriate record keeping to demonstrate compliance with Certification and Accreditation standards.

**Monitoring:**

None

**Reporting:**

None

Draft

### III. Emission Unit Specific Emission Limitations

The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements.

#### EU0010

#### Units With Permits, But No Other Applicable Limits

FIG POINT NUMBER	EMISSION UNIT NUMBER	FEDERAL	DESCRIPTION  (for information only, this does not create any permit requirements)
		Requirements of the Listed Construction Permits Obtained Under 10 CSR 10- 6.060	
AS-STL-01	SB-102-02	#1207	Bench spray booth (lab) (epoxy spray) (research and development)
CC-STL-01	CC-101-14	#1711	Hood venting a drying rack
CL-022-01	SB-022-01	OP	Spray booth (vehicle maintenance)
CL-048-01	MB-048-01	#5489	Vented paint mixing hoods (2)
CL-063-01	MB-063-01	#1491	Vented paint mixing rooms (2)
DB-027-01	PI-027-01	OP	Penetrant inspection booth
DB-027-01	PI-027-02	OP	Penetrant inspection booth
MO-029-A	MO-029-01	#1087	Lead melting furnace
MO-029-A	MO-029-02	#1520	Lead melting furnace
MS-027-06	MS-027-06	#6319	Cutting fluid concentrator
NONE	IT-027-01T	OP	Immersion tank 1 in the titanium line
PT-027-06	IT-027-02A	OP	Immersion tank 2 in the aluminum line
PT-027-08A	IT-027-02P	OP	Immersion tank 2 in the plating line
NONE	IT-027-02T	OP	Immersion tank 2 in the titanium line
PT-027-08A	IT-027-03P	OP	Immersion tank 3 in the plating line
PT-027-08A	IT-027-04P	OP	Immersion tank 4 in the plating line
NONE	IT-027-05T	OP	Immersion tank 5 in the titanium line
PT-027-12	IT-027-06A	OP	Immersion tank 6 in the aluminum line
PT-027-02	IT-027-06T	#1306	Immersion tank 6 in the titanium line
NONE	IT-027-07T	OP	Immersion tank 7 in the titanium line
PT-027-01	IT-027-08T	OP	Immersion tank 8 in the titanium line
PT-027-09A	IT-027-9P	OP	Immersion tank 9 in the plating line
PT-027-01	IT-027-09T	OP	Immersion tank 9 in the titanium line
PT-027-08B	IT-027-10P	OP	Immersion tank 10 in the plating line
PT-027-05	IT-027-11A	OP	Immersion tank 11 in the aluminum line
NONE	IT-027-11T	OP	Immersion tank 11 in the titanium line
PT-027-03	IT-027-12A	OP	Immersion tank 12 in the aluminum line
PT-027-08B	IT-027-12P	OP	Immersion tank 12 in the plating line
PT-027-03	IT-027-13A	OP	Immersion tank 13 in the aluminum line
NONE	IT-027-17P	OP	Immersion tank 17 in the plating line
PT-027-08B	IT-027-22P	OP	Immersion tank 22 in the plating line
NONE	IT-027-24P	OP	

EIG POINT NUMBER	EMISSION UNIT NUMBER	FEDERAL	
		Requirements of the Listed Construction Permits Obtained Under 10 CSR 10- 6.060	DESCRIPTION  (for information only, this does not create any permit requirements)
PT-027-08B	IT-027-27P	OP	Immersion tank 27A in the plating line
PT-027-10	IT-027-28P	OP	Immersion tank 28 in the plating line
NONE	IT-027-30P	OP	Immersion tank 30 in the plating line
NONE	IT-027-32P	OP	Immersion tank 32 in the plating line
PT-027-10	IT-027-33P	OP	Immersion tank 33 in the plating line
PT-027-10	IT-027-34P	OP	Immersion tank 34 in the plating line
PT-027-10	IT-027-35P	OP	Immersion tank 35 in the plating line
NONE	IT-027-36P	OP	Immersion tank 36 in the plating line
NONE	IT-027-37P	OP	Immersion tank 37 in the plating line
PT-027-10	IT-027-38P	OP	Immersion tank 38 in the plating line
NONE	IT-027-43P	OP	Immersion tank 43 in the plating line
NONE	IT-027-44P	OP	Immersion tank 44 in the plating line
NONE	IT-027-46P	OP	Immersion tank 46 in the plating line
NONE	IT-027-47P	OP	Immersion tank 47 in the plating line
PT-027-09B	IT-027-49P	OP	Immersion tank 49 in the plating line
NONE	IT-027-50P	OP	Immersion tank 50 in the plating line
NONE	IT-027-EA	OP	Immersion tank E in the aluminum line
NONE	IT-027-GA	OP	Immersion tank G in the aluminum line
NONE	IT-027-HA	OP	Immersion tank H in the aluminum line
NONE	IT-027-JA	#0970	Immersion tank J in the aluminum line
NONE	IT-027-KA	#0919	Immersion tank K in the aluminum line
PT-027-07	IT-027-MA	OP	Immersion tank M in the aluminum line
PT-029A-01	IT-029A-02	#6260	Immersion tank 2 in the tank line
PT-029A-01	IT-029A-03	#6260	Immersion tank 3 in the tank line
PT-029A-01	IT-029A-04	#6260	Immersion tank 4 in the tank line
PT-029A-01	IT-029A-05	#6260	Immersion tank 5 in the tank line
PT-029A-01	IT-029A-06	#6260	Immersion tank 6 in the tank line
PT-029A-01	IT-029A-10	#6260	Immersion tank 10 in the tank line
PT-029A-01	IT-029A-11	#6260	Immersion tank 11 in the tank line
PT-029A-01	IT-029A-14	#6260	Immersion tank 14 in the tank line
PT-029A-01	IT-029A-15	#6260	Immersion tank 15 in the tank line
PT-029A-01	IT-029A-16	#6260	Immersion tank 16 in the tank line
PT-029A-01	IT-029A-17	#6260	Immersion tank 17 in the tank line
PT-029A-01	IT-029A-18	#6260	Immersion tank 18 in the tank line
NONE	IT-051-01A	OP	Immersion tank 1 in the aluminum line
NONE	IT-051-01T	OP	Immersion tank 1 in the titanium line
NONE	IT-051-02T	OP	Immersion tank 2 in the titanium line
PT-051-02	IT-051-03T	OP	Immersion tank 3 in the titanium line
NONE	IT-051-04A	OP	Immersion tank 4 in the aluminum line
NONE	IT-051-04T	OP	Immersion tank 4 in the titanium line
PT-051-02	IT-051-05T	OP	Immersion tank 5 in the titanium line
NONE	IT-051-06A	OP	Immersion tank 6 in the aluminum line
PT-101-04	IT-101-01N	OP	Immersion tank (Desmut) in the nameplate line
PT-101-04	IT-101-02N	OP	Immersion tank (Strip) in the nameplate line
PT-101-04	IT-101-03N	OP	Immersion tank (Water) in the nameplate line

EIG POINT NUMBER	EMISSION UNIT NUMBER	FEDERAL	DESCRIPTION  (for information only, this does not create any permit requirements)
		Requirements of the Listed Construction Permits Obtained Under 10 CSR 10- 6.060	
PT-101-04	IT-101-04N	OP	Immersion tanks (hand tanks) in the nameplate line
PT-101-01	IT-101-05A	OP	Immersion tank 5 in the aluminum line
PT-101-02	IT-101-06A	#1303	Immersion tank 6 in the aluminum line
PT-101-03	IT-101-07A	#1304	Immersion tank 7 in the aluminum line
PT-101-04	DT-101-01	OP	Dip tank used for developing (Stoddard solvent)

OP = Unit is covered by an operating permit, but the construction permit was obtained prior to the effective date of 10 CSR 10-6.060 and was, therefore, extinguished by the issuance of the operating permit.

## **COMPLIANCE REQUIREMENTS**

### **I) Federally Enforceable Requirements**

#### **Permit Condition EU0010-001**

10 CSR 10-6.060

#### **Air Construction Permits**

- 1) **Requirements of the Construction Permit Numbers: #'s 1207, 1711, 1491, 1087, 1520, 1306, 1303, 1304, 0919, 0950, 6319 and 6260**

#### **Emission Limitations:**

None

#### **Record Keeping:**

None

#### **Monitoring:**

None

#### **Reporting:**

None

- 2) **Requirements of the Construction Permit Number: #5489 – Paint Mixing Hoods (2)**

#### **Emission Limitations:**

Emissions from painting operations covered by operating permit 3221, 3275, 3276, 3277, 5489, 6324, and 6447 shall be limited to 18 tons of VOC/year, 18 tons of any combination of HAPs/year or 10 tons of any individual HAP/year within a twelve month rolling period.

**Record Keeping:**

Permittee shall maintain monthly records of all materials utilized in the paint booths, including the amounts and the content of VOCs and HAPs in each material. These records shall be maintained, on site, for the latest sixty (60) month period.

**Monitoring:**

None

**Reporting:**

Should the records indicate that a violation of the emission limitation listed above has occurred, the permittee shall notify the St. Louis County Health Department Air Pollution Control Section at 111 S. Meramec Ave., Clayton, MO 63105 and the Missouri Department of Natural Resources Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, no later than the next day.

This notification is not required to be certified by a responsible official.

**EU0020**  
**Miscellaneous Specialty Coating Emission Units**

EIG POINT NUMBER	EMISSION UNIT NUMBER	STATE/LOCAL ONLY	DESCRIPTION  (for information only, this does not create any permit requirements)
		10 CSR 10-5.295: Control of Emissions From Aerospace Manufacture and Rework Facilities	
AS-STL-01	AS-STL-01	X	Plantwide adhesive/sealant usage
AS-STL-01	AS-101-01	X	Vented room (adhesive/sealant application)
AS-STL-01	AS-101-02	X	Vented room (adhesive/sealant application)
AS-STL-01	AS-101-03	X	Vented hood (adhesive/sealant application)
AS-STL-01	AS-101-04	X	Two vented hoods (adhesive/sealant applications)
BF-STL-02	VS-221-01	X	Vented bench (soldering & solvents)
BF-STL-02	VS-245-01	X	Vented solvent storage area
BF-STL-02	BF-STL-02	X	Other miscellaneous plantwide solvent building fugitives

X = Applicable      NA = Not Applicable

**COMPLIANCE REQUIREMENTS**

**I) State/Local Only Enforceable Requirements**

Permit Condition EU0020-001
10 CSR 10-5.295 <i>Control of Emissions From Aerospace Manufacture and Rework Facilities</i>

**Emission Limitations:**

- (1) Specialty coatings shall be limited to a VOC content as expressed in Table I of this rule (See Appendix 1).
- (2) Monthly averaging within specialty coating type may be used.

**Record Keeping:**

- (1) The permittee shall maintain a list of coatings in use with category and VOC content as applied.
- (2) The permittee shall record coating usage on a monthly basis.
- (3) The permittee shall maintain records of monthly volume-weighted average VOC content for each regulated coating type included in averaging for coating operations that achieve compliance through coating averaging under this rule.

**Monitoring:**

None

**Reporting:**

The permittee shall report to the St. Louis County Health Department Air Pollution Control Section at 111 S. Meramec Ave., Clayton, MO 63105 and the Missouri Department of Natural Resources Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, no later than thirty (30) days after the discovery that the VOC content limit set under Emission Limitations is exceeded (see Appendix 1).

**EU0030**

**Handwipe Solvent Building Fugitives**

EIG POINT NUMBER	EMISSION UNIT NUMBER	FEDERAL	STATE/LOCAL	DESCRIPTION (for information only, this does not create any permit requirements)
		1) 40 CFR Part 63, Subpart GG and 10 CSR 10-6.075: Aerospace Manufacturing and Rework Facilities NESHAAP - Handwipe Solvent Cleaning Operations	1) 10 CSR 10-5.295: Control of Emissions From Aerospace Manufacture and Rework Facilities	
BF-STL-03	BF-STL-03	X	X	Handwipe solvent building fugitives in buildings other than buildings with their own point
BF-002-03	BF-002-03	X	X	Handwipe solvent building fugitives in building 2
BF-027-03	BF-027-03	X	X	Handwipe solvent building fugitives in building 27
BF-029-03	BF-029-03	X	X	Handwipe solvent building fugitives in building 29 and 29A
BF-048-03	BF-048-03	X	X	Handwipe solvent building fugitives in building 48
BF-066-03	BF-066-03	X	X	Handwipe solvent building fugitives in the 60s buildings
BF-101-03	BF-101-03	X	X	Handwipe solvent building fugitives in building 101
BF-102-03	BF-102-03	X	X	Handwipe solvent building fugitives in building 102
BF-245-03	BF-245-03	X	X	Handwipe solvent building fugitives in building 245

X = Applicable NA = Not Applicable

**COMPLIANCE REQUIREMENTS**

**I) Federally Enforceable Requirements**

**Permit Condition EU0030-001**

10 CSR 10-6.075 and 40 CFR Part 63, Subpart GG

***Aerospace Manufacturing and Rework Facilities- Handwipe Solvent Cleaning***

**Emission Limitations:**

(1) Housekeeping measures

(a) Workers shall place cleaning solvent-laden cloth, paper, or any other absorbent applicators used for cleaning in aerospace production in closed containers (such as plastic bags, dome top cans or step cans with the lids down) before leaving their work area. Ensure that these bags and containers are kept closed at all times except when depositing or removing

these materials from the container. Use bags and containers of such design so as to contain, as practicable, the vapors of the cleaning solvent. Cotton-tipped swabs or equivalent used for very small cleaning are exempt from this requirement.

- (b) Store fresh and spent cleaning solvents, except semi-aqueous solvent cleaners, used in aerospace cleaning operations in closed containers (such as flip-top or squirt bottles with small openings, safety cans or drums with closed bungs).
  - (c) Conduct the handling and transfer of cleaning solvents to or from enclosed systems, vats, waste containers, and other cleaning operation equipment that hold or store fresh or spent cleaning solvents in such a manner that minimizes spills.
  - (d) Activities not conforming to the above housekeeping measures are deemed in compliance if corrected within 24 hours, unless they are observed on three (3) successive inspections.
- (2) Hand-wipe cleaning
- (a) Each owner or operator of a new or existing affected hand-wipe cleaning operation covered by 40 CFR Part 63, Subpart GG, shall use cleaning solvents that meet one of the following requirements:
    - 1. Meet (1) one of the composition requirements in section 63.744 (Table 1) of the Aerospace NESHAP.
    - 2. Have a composite vapor pressure of 45 mm Hg or less at 20° Celsius. (68° Fahrenheit)
    - 3. Demonstrate that the volume of hand-wipe cleaning solvents used in affected cleaning operations has been reduced by at least 60% from a baseline adjusted for production. The baseline shall be established as part of an approved alternative plan administered by the State.
  - (b) The following cleaning operations are exempt from the requirements of (2) Hand-wipe cleaning:
    - 1. Cleaning during the manufacture, assembly, installation, maintenance, or testing of components of breathing oxygen systems that are exposed to the breathing oxygen;
    - 2. Cleaning during the manufacture, assembly, installation, maintenance or testing of parts, subassemblies, or assemblies that are exposed to strong oxidizers or reducers (e.g., nitrogen tetroxide, liquid oxygen, hydrazine, etc.);
    - 3. Cleaning and surface activation prior to adhesive bonding;
    - 4. Cleaning of electronic parts and assemblies containing electronic parts;
    - 5. Cleaning of aircraft and ground support equipment fluid systems that are exposed to the fluid, including air-to air heat exchangers and hydraulic fluid systems;
    - 6. Cleaning of fuel cells, fuel tanks, and confined spaces;
    - 7. Surface cleaning of solar cells, coated optics, and thermal control surfaces;
    - 8. Cleaning during fabrication, assembly, installation, and maintenance of upholstery, curtains, carpet, and other textile materials used in the interior of the aircraft;

9. Cleaning of metallic and non-metallic materials used in honeycomb cores during the manufacture or maintenance of these cores, and cleaning of the completed cores used in the manufacture of aerospace vehicles or components;
  10. Cleaning and cleaning solvent usage associated with research and development, quality control, and laboratory testing;
  11. Cleaning of aircraft transparencies, polycarbonate or glass substrates;
  12. Cleaning operations, using nonflammable liquids, conducted within five (5) feet of energized electrical systems. Energized electrical systems means AC or DC electrical circuit on an assembled aircraft once electrical power is connected, including interior passenger and cargo areas, wheel wells and tail sections; and
  13. Cleaning operations identified as essential uses under the Montreal Protocol for which the Administrator has allocated essential use allowances or exemptions in 40 CFR 82.4.
- (3) This rule is only applicable to actual manufacture and rework of production aerospace vehicles.

**Record Keeping:**

- (1) Each owner or operator of a new or existing cleaning operation shall record the information specified below:
  - (a) the name, vapor pressure, and documentation showing the organic HAP constituents of each cleaning solvent used for affected cleaning operations at the facility.
  - (b) For each cleaning solvent used in hand-wipe cleaning operations that complies with the composition requirements for semi-aqueous cleaning solvents used for flush cleaning operations:
    1. The name of each cleaning solvent used; and
    2. All data and calculations that demonstrate that the cleaning solvent complies with one of the composition requirements.
- (2) Annual records of the volume of each solvent used, as determined from facility purchase records or usage records.
- (3) For each cleaning solvent used in hand-wipe cleaning operations that does not comply with the composition requirements, but does comply with the vapor pressure requirement:
  - (a) The name of each cleaning solvent used;
  - (b) The composite vapor pressure of each cleaning solvent used;
  - (c) All vapor pressure test results, if appropriate, data and calculations used to determine the composite vapor pressure of each cleaning solvent; and
  - (d) The amount (in gallons) of each cleaning solvent used each month at each operation.
- (4) For each cleaning solvent used for exempt hand-wipe cleaning operations:
  - (a) The identity and amount (in gallons) of each cleaning solvent used each month at each operation; and
  - (b) A list of the exempt processes to which the cleaning operation applies.
- (5) Records of the random quarterly inspections will be maintained.

**Monitoring:**

- (1) The permittee will perform random quarterly inspections on the housekeeping measures.
  - (a) If a deviation is observed, the area will be inspected again within the next five (5) working days.
  - (b) If a second deviation is observed, the area will be inspected again within the next five (5) working days. This is the third (3<sup>rd</sup>) successive inspection as referenced in the Emissions Limitations section.

**Reporting:**

- (1) Each owner or operator of a cleaning operation shall submit the following information:
  - (a) Semiannual reports occurring every six (6) months that identify:
    1. Any instance where a non-compliant cleaning solvent is used for a nonexempt hand-wipe cleaning operation;
    2. A list of any new cleaning solvents used for hand-wipe cleaning in the previous six (6) months and, as appropriate, their composite vapor pressure or notification that they comply with the composition requirements; and
    3. If the operations have been in compliance for the semiannual period, a statement that the cleaning operations have been in compliance with the applicable standards.

**II) State/Local Only Enforceable Requirements**

**Permit Condition EU0030-002**

10 CSR 10-5.295

***Control of Emissions From Aerospace Manufacture and Rework Facilities***

**Emission Limitations:**

- (1) Housekeeping measures
  - (a) Workers shall place cleaning solvent-laden cloth, paper, or any other absorbent applicators used for cleaning in aerospace production in closed containers (such as plastic bags, dome top cans or step cans with the lids down) before leaving their work area. Ensure that these bags and containers are kept closed at all times except when depositing or removing these materials from the container. Use bags and containers of such design so as to contain, as practicable, the vapors of the cleaning solvent. Cotton-tipped swabs or equivalent used for very small cleaning are exempt from this requirement.
  - (b) Store fresh and spent cleaning solvents, except semi-aqueous solvent cleaners, used in aerospace cleaning operations in closed containers (such as flip-top or squirt bottles with small openings, safety cans or drums with closed bungs).
  - (c) Conduct the handling and transfer of cleaning solvents to or from enclosed systems, vats, waste containers, and other cleaning operation equipment that hold or store fresh or spent cleaning solvents in such a manner that minimizes spills.
  - (d) Activities not conforming to the above housekeeping measures are deemed in compliance if corrected within 24 hours, unless they are observed on three (3) successive inspections.

(2) Hand-wipe cleaning

- (a) Each owner or operator of a new or existing affected hand-wipe cleaning operation covered by 10 CSR 10-5.295, shall use cleaning solvents that meet one of the following requirements:
1. Meet (1) one of the composition requirements in 10 CSR 10-5.295.
  2. Have a composite vapor pressure of 45 mm Hg or less at 20° Celsius. (68° Fahrenheit)
  3. Demonstrate that the volume of hand-wipe cleaning solvents used in affected cleaning operations has been reduced by at least 60% from a baseline adjusted for production. The baseline shall be established as part of an approved alternative plan administered by the State.
- (b) The following cleaning operations are exempt from the requirements of (2) Hand-wipe cleaning:
1. Cleaning during the manufacture, assembly, installation, maintenance, or testing of components of breathing oxygen systems that are exposed to the breathing oxygen;
  2. Cleaning during the manufacture, assembly, installation, maintenance or testing of parts, subassemblies, or assemblies that are exposed to strong oxidizers or reducers (e.g., nitrogen tetroxide, liquid oxygen, hydrazine, etc.);
  3. Cleaning and surface activation prior to adhesive bonding;
  4. Cleaning of electronic parts and assemblies containing electronic parts;
  5. Cleaning of aircraft and ground support equipment fluid systems that are exposed to the fluid, including air-to air heat exchangers and hydraulic fluid systems;
  6. Cleaning of fuel cells, fuel tanks, and confined spaces;
  7. Surface cleaning of solar cells, coated optics, and thermal control surfaces;
  8. Cleaning during fabrication, assembly, installation, and maintenance of upholstery, curtains, carpet, and other textile materials used in the interior of the aircraft;
  9. Cleaning of metallic and non-metallic materials used in honeycomb cores during the manufacture or maintenance of these cores, and cleaning of the completed cores used in the manufacture of aerospace vehicles or components;
  10. Cleaning and cleaning solvent usage associated with research and development, quality control, and laboratory testing;
  11. Cleaning of aircraft transparencies, polycarbonate or glass substrates;
  12. Cleaning operations, using nonflammable liquids, conducted within five (5) feet of energized electrical systems. Energized electrical systems means AC or DC electrical circuit on an assembled aircraft once electrical power is connected, including interior passenger and cargo areas, wheel wells and tail sections; and
  13. Cleaning operations identified as essential uses under the Montreal Protocol for which the Administrator has allocated essential use allowances or exemptions in 40 CFR 82.4.

- (3) This rule is only applicable to actual manufacture and rework of production aerospace vehicles.

**Record Keeping:**

- (1) For cleaning solvents subject to this rule, maintain:
- (a) a list of materials with corresponding water contents for aqueous and semi-aqueous hand-wipe cleaning solvents;
  - (b) a current list of cleaning solvents in use with their respective vapor pressure or, for blended solvents, VOC composite vapor pressure for all vapor pressure compliant hand-wipe cleaning solvents. This list shall include the monthly amount of each applicable solvent used; and
  - (c) a current list of exempt hand-wipe cleaning processes for all cleaning solvents with a vapor pressure greater than forty-five (45) mmHg used in exempt hand-wipe cleaning operations. This list shall include the monthly amount of each applicable solvent used.
- (2) Records of the random quarterly inspections will be maintained.

**Monitoring:**

- (1) The permittee will perform random quarterly inspections on the housekeeping measures.
- (a) If a deviation is observed, the area will be inspected again within the next five (5) working days.
  - (b) If a second deviation is observed, the area will be inspected again within the next five (5) working days. This is the third (3<sup>rd</sup>) successive inspection as referenced in the Emissions Limitations section.

**Reporting:**

The permittee shall report to the St. Louis County Health Department Air Pollution Control Section at 111 S. Meramec Ave., Clayton, MO 63105 and the Missouri Department of Natural Resources Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, no later than thirty (30) days after the discovery that the VOC content limit set under Emission Limitations (2)(a) is exceeded.

**EU0040**  
Cold Cleaners

EIG POINT NUMBER	EMISSION UNIT NUMBER	FEDERAL		DESCRIPTION (for information only, this does not create any permit requirements)
		1) 10 CSR 10- 5.300: Control of Emissions from Solvent Metal Cleaning	2) Requirements of the Listed Construction Permits Obtained Under 10 CSR 10- 6.060	
CC-STL-01	CC-STL-01A	X	NA	Plantwide cold cleaners greater than 1 gal and 1 ft <sup>2</sup> surface area
CC-STL-01	CC-102-01	X	NA	Cold cleaner for hydraulic equipment
CC-STL-01	CC-105-01	NA	#6180	Cold cleaner for electronics only (Moving to 101)
CC-STL-01	CC-221-01	NA	#6114	Cold cleaner for electronics only
CC-101-01	CC-101-03	X	NA	Cold cleaner used for tube cleaning

X = Applicable NA = Not Applicable

## **COMPLIANCE REQUIREMENTS**

### **I) Federally Enforceable Requirements**

Permit Condition EU0040-001
10 CSR 10-5.300 <b>Control of Emissions from Solvent Metal Cleaning</b>

#### **Emission Limitations:**

- (1) Operating procedures (section (5)(A) Cold Cleaners):
  - (a) Covers shall be closed whenever parts are not being handled in the cleaners, or solvent must drain into an enclosed reservoir.
  - (b) Cleaned parts shall be drained in the free board area for fifteen (15) seconds, or until dripping stops, whichever is longer.
  - (c) Whenever a cold cleaner fails to perform within the operating parameters established by this rule, the unit shall be shut down and secured until trained service personnel are able to restore operation within the established parameters.
  - (d) Solvent leaks shall be repaired immediately, or the degreaser shall be shut down and the leaks secured until they can be more permanently repaired.
  - (e) Waste material removed from a cold cleaner shall be disposed of by one of the methods listed in the rule or equivalent (after the director's approval) and in accordance with 10 CSR 25, as applicable.
  - (f) Waste solvent shall be stored in closed containers only.
- (2) Equipment specifications (section (4)(A) Cold Cleaners):
  - (a) After September 30, 1998
    1. The cold cleaning solvent vapor pressure shall not exceed 2.0 millimeters of Mercury (mmHg) at twenty degrees Celsius (20°C) (sixty-eight degrees Fahrenheit (68°F)) unless the cold cleaner is used for carburetor cleaning.

2. The cold cleaning solvent vapor pressure shall not exceed 7.0 millimeters of Mercury (mmHg) at twenty degrees Celsius (20°C) (sixty-eight degrees Fahrenheit (68°F)) for cold cleaners used for carburetor cleaning.
- (b) After April 1, 2001
1. The cold cleaning solvent vapor pressure shall not exceed 1.0 millimeters of Mercury (mmHg) at twenty degrees Celsius (20°C) (sixty-eight degrees Fahrenheit (68°F)) unless the cold cleaner is used for carburetor cleaning.
  2. The cold cleaning solvent vapor pressure shall not exceed 5.0 millimeters of Mercury (mmHg) at twenty degrees Celsius (20°C) (sixty-eight degrees Fahrenheit (68°F)) for cold cleaners used for carburetor cleaning.
- (c) Exemptions under (4) (A) 3. may apply.
- (d) Alternate methods for reducing cold cleaning emissions may be used if the permittee shows the emission control is at least equivalent to the control in (a) and (b) above and is approved by the director.
- (e) Each cold cleaner will have a cover which will prevent the escape of solvent vapors while in the closed position or enclosed reservoir which will limit the escape of solvent vapors whenever parts are not being processed in the cleaner.
- (f) When one (1) or more of the following conditions exist the design of the cover shall be such that it can easily be operated with one (1) hand and without disturbing the solvent vapors in the tank. (For covers larger than ten (10) square feet, this shall be accomplished by either mechanical assistance or by a power system.)
1. The solvent volatility is greater than 0.3 psi at one hundred degrees Fahrenheit (100°F)
  2. The solvent is agitated.
  3. The solvent is heated.
- (g) A drainage facility allowing parts to drain while the cover is closed is required.
- (h) If an internal drainage facility as in (g) cannot fit into the cleaning system and the solvent volatility is less than 0.6 psi at one hundred degrees Fahrenheit (100°F), then the cold cleaner shall have an external drainage facility which provides for the solvent to drain back into the solvent bath.
- (i) Solvent sprays shall be a solid fluid stream and at a pressure which does not cause splashing above or beyond the freeboard.
- (j) A permanent conspicuous label summarizing the operating procedures shall be affixed to the equipment.
- (k) Any cold cleaner which uses a solvent that has a solvent volatility greater than 0.6 psi at one hundred degrees Fahrenheit (100°F) or heated above one hundred twenty degrees Fahrenheit (120°F) must have one (1) of the following control devices:
1. A freeboard ratio of at least 0.75
  2. Water cover (solvent must be insoluble in and heavier than water)
  3. Another control system that has a mass balance demonstrated emission reduction efficiency of at least sixty-five percent (65%) and is approved by the director prior to use.
- (3) Operator and Supervisor Training (section (6):

- (a) Persons who operate a cold cleaner shall be trained in the operational and equipment requirements specified in this rule.
- (b) The supervisor of any person who operates a cold cleaner shall receive equal or greater operational training than the operator.
- (c) Persons who operate a cold cleaner shall receive refresher training at least once each twelve (12) months.

**Record Keeping:**

- (1) For cold cleaners subject to a) (2) (a) or (b) the following records for each sale of cold cleaning solvent shall be maintained and retained for two (2) years:
  - (a) The name and address of the solvent supplier
  - (b) The date of purchase
  - (c) The type of solvent
  - (d) The vapor pressure of the solvent in mmHg at 20°C (68°F)
- (2) A record shall be kept of the cold cleaner training for each employee and shall be retained for two (2) years.
- (3) Monthly records of the following shall be kept for a period of two (2) years:
  - (a) Solvent types and amount purchased
  - (b) Types and amounts of solvent containing waste material:
    - 1. Transferred to a contract reclamation service or disposal facility
    - 2. Distilled on the premises
  - (c) Maintenance and repair logs for the cold cleaner and any associated control equipment

**Monitoring:**

None

**Reporting:**

The permittee shall report to the St. Louis County Health Department Air Pollution Control Section at 111 S. Meramec Ave., Clayton, MO 63105 and the Missouri Department of Natural Resources Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, no later than thirty (30) days after the discovery of any exceedance of the vapor pressure limit set under Emission Limitations (2) in 10 CSR 10-5.300.

**Permit Condition EU0040-002**

10 CSR 10-6.060

**Air Construction Permits**

**1) Requirements of Construction Permit Number: #6180 (Parts Cleaner for Electronic Parts)**

**Emission Limitations:**

Solvents are limited to N-methyl pyrrolidone or an aliphatic hydrocarbon which has been pre-approved by the St. Louis County Air Pollution Control Program Manager (such as Axarel 2200 or Micropure CDF).

**Record Keeping:**

Maintain monthly records showing by type of solvent the volume and weight of each material added to the unit.

**Monitoring:**

None

**Reporting:**

None

**2) Requirements from Construction Permit Number: #6114 (Parts Cleaner for Electronic Parts)**

**Emission Limitations:**

The operation is limited to 5,500 pounds of solvent on a twelve (12) month rolling average.

**Record Keeping:**

Maintain monthly records showing the volume and weight of each material added to the unit and the twelve (12) month rolling average.

**Monitoring:**

None

**Reporting:**

If the Record Keeping Requirements show that the Emission Limitations have been exceeded, St. Louis County Health Department Air Pollution Control Section at 111 S. Meramec Ave., Clayton, MO 63105 and the Missouri Department of Natural Resources Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, shall be notified by the next working day. This notification is not required to be certified by a responsible official.

**EU0050**

**Spray Gun Cleaning Operations**

EIG POINT NUMBER	EMISSION UNIT NUMBER	FEDERAL		DESCRIPTION (for information only, this does not create any permit requirements)
		1) 10 CSR 10-5.300: Control of Emissions from Solvent Metal Cleaning	2) 40 CFR Part 63, Subpart GG and 10 CSR 10-6.075: Aerospace Manufacturing and Rework Facilities NESHAP - Spray Gun Cleaning Operations	
BF-STL-02	CC-STL-01B	NA	X	Plantwide spray gun cleaning

X = Applicable      NA = Not Applicable

## **COMPLIANCE REQUIREMENTS**

### **I) Federally Enforceable Requirements**

<b>Permit Condition EU0050-001</b>
10 CSR 10-6.075 and 40 CFR Part 63, Subpart GG <b><i>Aerospace Manufacturing and Rework Facilities NESHAP – Spray Gun Cleaning</i></b>

#### **Emission Limitations:**

(1) Housekeeping measures

- (a) Operators shall place aerospace production cleaning solvent-laden cloth, paper, or other absorbent applicators used for cleaning in closed containers (such as plastic bags or step cans with the lids down) before leaving their work area. Ensure that these bags and containers are kept closed at all times except when depositing or removing these materials from the container. Use bags and containers of such design so as to contain the vapors of the cleaning solvent. Cotton-tipped swabs used for very small cleaning operations are exempt from this requirement.
- (b) Store fresh and spent cleaning solvents, except semi-aqueous solvent cleaners, used in aerospace cleaning operations in closed containers (such as flip-top or squirt bottles with small openings, safety cans or drums with closed bungs).
- (c) Conduct the handling and transfer of cleaning solvents to or from enclosed systems, vats, waste containers, and other cleaning operation equipment that hold or store fresh or spent cleaning solvents in such a manner that minimizes spills.

(2) Spray gun cleaning

- (a) Each owner or operator of a new or existing spray gun cleaning operation shall use one or more of the techniques, or their equivalent, specified in this section. Spray gun cleaning operations using cleaning solvent solutions that contain HAP and VOC below de minimis levels specified in 63.741 (f) are exempt from these requirements.
  - 1. Enclosed Systems. Clean the spray gun in an enclosed system that is closed at all times except when inserting or removing the spray gun. Cleaning shall consist of forcing the cleaning solvent through the gun. If leaks are found during the monthly inspection required in 63.751 (a), repairs shall be made as soon as practicable, but no later than 15 days after the leak was found. If the leak is not repaired by the 15<sup>th</sup> day after detection, the cleaning solvent shall be removed and the enclosed cleaner shall be shut down until the leak is repaired or its use is permanently discontinued.
  - 2. Nonatomized cleaning. Clean the spray gun by placing cleaning solvent in the pressure pot and forcing it through the gun with the atomizing cap in place. No atomizing air is to be used. Direct the cleaning solvent from the spray gun into a vat, drum, or other waste container that is closed when not in use.
  - 3. Disassembled spray gun cleaning. Disassemble the spray gun and clean the components in a vat, which shall remain closed at all times except when in use. Alternatively, soak the components in a vat, which shall

remain closed during the soaking period and when not inserting or removing components.

4. Atomizing cleaning. Clean the spray gun by forcing the cleaning solvent through the gun and direct the resulting atomized spray into a waste container that is fitted with a device designed to capture the atomized cleaning solvent emissions.

**Record Keeping:**

- (1) A record of all leaks from enclosed spray gun cleaners that includes for each leak found:
  - (a) Source identification
  - (b) Date leak was discovered
  - (c) Date leak was repaired
- (2) Each owner or operator using an enclosed spray gun cleaner shall keep records of the visual inspections.

**Monitoring:**

- (1) Each owner or operator using an enclosed spray gun cleaner shall visually inspect the seals and all other potential sources of leaks associated with each enclosed spray gun cleaner system at least once per month. Each inspection shall occur while the system is in operation.

**Reporting:**

- (1) Each owner or operator of a cleaning operation shall submit the following information:
  - (a) Semiannual reports occurring every six (6) months.
  - (b) If the operations have been in compliance for the semiannual period, a statement that the cleaning operations have been in compliance with the applicable standards.

**EU0060**  
**Coating Lines**

EIG POINT NUMBER	EMISSION UNIT NUMBER	FEDERAL				STATE/ LOCAL ONLY	DESCRIPTION (for information only, this does not create any permit requirements)
		1) 40 CFR Part 63, Subpart GG and 10 CSR 10-6.075: Aerospace Manufacturing and Rework Facilities NESHAP - Primers and Topcoats	2) 10 CSR 10-5.050: Restriction of Emission of Particulate Matter from Industrial Processes	3) 10 CSR 10-5.380: Control of Emissions From Industrial Surface Coating Operations	4) Requirements of the Listed Construction Permits Obtained Under 10 CSR 10-6.060	1) 10 CSR 10-5.295: Control of Emissions From Aerospace Manufacture and Rework Facilities	
CL-002-01	SB-002-01	X	X	X	#1780	X	Large spray booth (production parts)
AS-STL-01	SB-002-04	NA	NA	NA	NA	X	Booth for various activities (adhesive/sealant)
CL-002-02	SB-002-06	NA	X	NA	NA	NA	Spray booth (maintenance) (sanding)
CL-027-01	SB-027-01	X	X	X	NA	X	Paint booth (mostly production) (some sanding)
CL-027-01	SB-027-02	X	X	X	NA	X	Paint booth (mostly production) (some sanding)
CL-027-01	SB-027-03	X	X	X	NA	X	Paint booth (mostly production) (some sanding)
CL-027-01	SB-027-04	X	X	X	NA	X	Paint booth (mostly production) (some sanding)
CL-027-01	SB-027-05	X	X	X	NA	X	Paint booth (mostly production) (some sanding)
CL-029-01	SB-029-01	X	X	X	#6259	X	Adhesive bonding coating line
CL-029-02	SB-029A-02	X	X	X	#5739	X	Spray booth (mostly QA/QC) (possible production)
CL-048-01	SB-048-01	X	X	X	#3221	X	Paint booth (aerospace production)
CL-048-01	SB-048-02	X	X	X	#3275	X	Paint booth (aerospace production)

EIG POINT NUMBER	EMISSION UNIT NUMBER	FEDERAL				STATE/ LOCAL ONLY	DESCRIPTION (for information only, this does not create any permit requirements)
		1) 40 CFR Part 63, Subpart GG and 10 CSR 10-6.075: Aerospace Manufacturing and Rework Facilities NESHAP - Primers and Topcoats	2) 10 CSR 10-5.050: Restriction of Emission of Particulate Matter from Industrial Processes	3) 10 CSR 10-5.330: Control of Emissions From Industrial Surface Coating Operations	4) Requirements of the Listed Construction Permits Obtained Under 10 CSR 10-6.060	1) 10 CSR 10-5.295: Control of Emissions From Aerospace Manufacture and Rework Facilities	
CL-048-01	SB-048-03	X	X	X	#3276	X	Paint booth (aerospace production)
CL-048-01	SB-048-04	X	X	X	#3277	X	Paint booth (aerospace production)
CL-048-01	SB-048-05	X	X	X	#6324	X	Paint booth (aerospace production)
CL-048-01	SB-048-06	X	X	X	#6447	X	Paint booth (aerospace production)
CL-060-01	SB-060-01	NA	X	NA	NA	NA	Spray booth (cans of primer) (research and development)
CL-063-01	SB-063-01	X	X	X	#1490	X	Spray booth (paint & others) (aerospace production)
CL-066-01	SB-066-01	X	X	X	#1369	X	Spray booth (aerospace production) (painting and sanding)
CL-066-01	SB-066-02	NA	X	NA	#1366	NA	Spray booth (research and development)
CL-101-01	SB-101-25	X	X	X	NA	X	Spray booth (aerospace production) (painting and sanding)
CL-101-01	SB-101-26	X	X	X	NA	X	Spray booth (aerospace production) (painting and sanding)

EIG POINT NUMBER	EMISSION UNIT NUMBER	FEDERAL				STATE/ LOCAL ONLY	DESCRIPTION (for information only, this does not create any permit requirements)
		1) 40 CFR Part 63, Subpart GG and 10 CSR 10-6.075: Aerospace Manufacturing and Rework Facilities NESHAP - Primers and Topcoats	2) 10 CSR 10-5.050: Restriction of Emission of Particulate Matter from Industrial Processes	3) 10 CSR 10-5.330: Control of Emissions From Industrial Surface Coating Operations	4) Requirements of the Listed Construction Permits Obtained Under 10 CSR 10-6.060	1) 10 CSR 10-5.295: Control of Emissions From Aerospace Manufacture and Rework Facilities	
CL-101-01	SB-101-27	X	X	X	NA	X	Spray booth (aerospace production) (painting and sanding)
AS-STL-01	SB-101-29	NA	NA	NA	#1624	X	Spray booth (sealants and adhesives)
CL-101-01	SB-101-30	X	X	X	NA	X	Spray booth (aerospace production) (painting and sanding)
CL-101-01	SB-101-39	X	X	X	NA	X	Spray booth (aerospace production) (painting and sanding)
CL-101-01	SB-101-44	NA	NA	NA	NA	NA	Spray booth (developers: ex: KPR Resist) (not primer or topcoat)
CL-101-02	SB-101-02	X	X	X	#1754	X	Spray booth (aerospace production) (painting and sanding)
CL-101-02	SB-101-33	X	X	X	NA	X	Spray booth (aerospace production) (painting and sanding)
CL-101-02	SB-101-40	X	X	X	NA	X	Spray booth (aerospace production) (painting and sanding)

EIG POINT NUMBER	EMISSION UNIT NUMBER	FEDERAL				STATE/ LOCAL ONLY	DESCRIPTION (for information only, this does not create any permit requirements)
		1) 40 CFR Part 63, Subpart GG and 10 CSR 10-6.075: Aerospace Manufacturing and Rework Facilities NESHAP - Primers and Topcoats	2) 10 CSR 10-5.050: Restriction of Emission of Particulate Matter from Industrial Processes	3) 10 CSR 10-5.330: Control of Emissions From Industrial Surface Coating Operations	4) Requirements of the Listed Construction Permits Obtained Under 10 CSR 10-6.060	1) 10 CSR 10-5.295: Control of Emissions From Aerospace Manufacture and Rework Facilities	
CL-101-02	SB-101-40A	X	X	X	NA	X	Spray booth (aerospace production) (painting and sanding)
CL-101-03	SB-101-04	NA	X	NA	#5988	NA	Spray booth (research and development)
CL-101-03	SB-101-41	X	X	X	#1621	X	Spray booth (research and development) (could be used for production)
CL-101-03	SB-101-06	X	X	X	#1473	X	Spray booth (mock-up & tooling) (could be used for production)
CL-101-03	SB-101-43	NA	X	NA	#1474	NA	Spray booth (robotic & hand applied) (research and development)
CL-101-03	SB-101-35	X	X	X	#1475	X	Spray booth (robotic & hand applied) (research and development) (could be used for production)
CL-101-03	SB-101-45	NA	X	NA	#6208	NA	Robotic Sprayer (research and development)
CL-102-01	SB-102-01	NA	X	NA	#1207	NA	Bench spray booth (research & development)
CL-102-01	SB-102-03	X	X	X	#1042	X	Paint booth (aerospace) (mostly research and development) (some aerospace production)

EIG POINT NUMBER	EMISSION UNIT NUMBER	FEDERAL				STATE/ LOCAL ONLY	DESCRIPTION (for information only, this does not create any permit requirements)
		1) 40 CFR Part 63, Subpart GG and 10 CSR 10-6.075: Aerospace Manufacturing and Rework Facilities NESHAP - Primers and Topcoats	2) 10 CSR 10-5.050: Restriction of Emission of Particulate Matter from Industrial Processes	3) 10 CSR 10-5.330: Control of Emissions From Industrial Surface Coating Operations	4) Requirements of the Listed Construction Permits Obtained Under 10 CSR 10-6.060	1) 10 CSR 10-5.295: Control of Emissions From Aerospace Manufacture and Rework Facilities	
CL-245-02	SB-245-02	NA	X	NA	#1709	NA	Paint booth (maintenance)
CL-248-01	SB-248-01	NA	X	NA	#1753	NA	Paint booth (mock-up) (research and development)
NONE	SB-101-10	NA	X	NA	#1668	NA	Spray Booth (Plasma spray coater) (research and development)
NONE	SB-101-34	NA	X	NA	NA	NA	Spray booth (Arc Spray)

X = Applicable NA = Not Applicable

## COMPLIANCE REQUIREMENTS

### I) Federally Enforceable Requirements

Permit Condition EU0060-001
10 CSR 10-6.075 and 40 CFR Part 63, Subpart GG <b>Aerospace Manufacturing and Rework facilities NESHAP - Primers and Topcoats</b>

#### Emission Limitations:

##### (1) Primers:

- (a) shall be limited to a VOC content of 350 grams per liter or 2.9 pounds per gallon (VOC content is measured less water and exempt solvent) as applied.
- (b) shall be limited to an organic HAP content of 350 grams per liter or 2.9 pounds per gallon (organic HAP content is measured less water and exempt solvent) as applied.
- (c) The VOC content may be used as a surrogate for the organic HAP content.

##### (2) Topcoats:

- (a) shall be limited to a VOC content of 420 grams per liter or 3.5 pounds per gallon (VOC content is measured less water and exempt solvent) as applied.
- (b) shall be limited to a VOC content of 420 grams per liter or 3.5 pounds per gallon (organic HAP content is measured less water and exempt solvent) as applied.
- (c) The VOC content may be used as a surrogate for the organic HAP content.

- (3) Averaging (as described in 63.745(e) (2) & 750 (d)) can be used to meet the Primer and Topcoat limits.
- (4) Inorganic HAP Control. The airflow shall be exhausted through a dry particulate filter system that meets the limits in 40 CFR 63.745 (g) by Method 319 when primers or topcoats containing inorganic HAPs are being sprayed.
- (5) The usage of specialty coatings as defined in 40 CFR 63 Subpart GG are not covered by this rule.
- (6) Work practice standards
  - (a) Primers and topcoats shall be handled in a manner to minimize spills.
  - (b) Primers and topcoats shall be applied in a manner consistent with the requirements of this rule.

**Record Keeping:**

- (1) Primers and Topcoats
  - (a) Record the name and VOC content as applied of each primer and topcoat used in production areas.
  - (b) For low HAP content primers and topcoats record keeping complying with 63.752 (c)(3) may be used.
  - (c) If averaging is used to meet the primer and topcoat limits record keeping shall comply with 63.752 (c)(4).
- (2) Inorganic HAP Control
  - (a) Record the pressure drop (either electronically or manually) once each operating shift that inorganic HAP containing primer or topcoat is spray applied.
    1. The pressure drop records are deemed to be complete if 95% of the readings are recorded for all of the booths subject to this rule in any six (6) month period. If the last reading recorded correctly prior to any group of missed readings and the first reading recorded correctly after the same group of missed readings are both below the pressure drop limit, the missed readings are deemed to be below the pressure drop limit.
    2. For this provision, a shift is an 8 hour period (12:00 midnight to 8:00 AM, 8:00 AM to 4:00 PM, and 4:00 PM to 12:00 midnight).

**Monitoring:**

- (1) For dry filters, install differential pressure gauge across filter bank. Continuously monitor the pressure drop when inorganic HAP containing primers and topcoats are spray applied and take corrective action if pressure drop falls outside the manufacturer's limits.

**Reporting:**

- (1) Every six (6) months:
  - (a) Report all times when a primer or topcoat application containing inorganic HAP was not immediately shut down when the pressure drop across a dry particulate filter was outside limit(s) as specified by the filter or booth manufacturer.
  - (b) Report any times where primers or topcoats exceeded the appropriate VOC or organic HAP limit.

- (c) If the operations have been in compliance for the semiannual period, (provide ) a statement that the operations have been in compliance with the applicable standards.
- (2) Annually: (Report) the number of times the pressure drop was outside the limit(s) as specified by the filter or booth manufacturer.

**Permit Condition EU0060-002**

10 CSR 10-5.050

***Restriction of Emission of Particulate Matter from Industrial Processes***

**Emission Limitations:**

No person shall cause, suffer, allow or permit the emission of particulate matter in any one (1) hour to exceed the concentration shown in Table II of the rule for the process weight rate associated with that source.

**Record Keeping:**

The one-time compliance calculation based on the particulate concentration of particulates being emitted from each booth must be kept as a record.

**Monitoring:**

None

**Reporting:**

The permittee shall report to the St. Louis County Health Department Air Pollution Control Section at 111 S. Meramec Ave., Clayton, MO 63105 and the Missouri Department of Natural Resources Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, no later than thirty (30) days after the discovery of any exceedance of particulate emission limits required by Emission Limitations.

**Permit Condition EU0060-003**

10 CSR 10-5.330

***Control of Emissions From Industrial Surface Coating Operations***

**Emission Limitations:**

- (1) Primers (as defined in 10 CSR 10-5.295) shall be limited to a VOC content of 6.0 lb/gal. (VOC content is measured less water and exempt solvents.)
- (2) Topcoats (as defined in 10 CSR 10-5.295) shall be limited to a VOC content of 5.0 lb/gal. (VOC content is measured less water and exempt solvents.)
- (3) Specialty coatings as defined per 10 CSR 10-5.295 are not subject to this rule.
- (4) This rule is expected to be modified to exempt Aerospace facilities. At the time those modifications take effect, this rule and all of the requirements of it are no longer considered to be an applicable requirement of this permit.

**Record Keeping:**

- (1) Follow the appropriate record keeping requirements detailing specific VOC sources as necessary for the director to determine daily compliance. These records may include:
  - (a) Daily records of the type and the quantity of coatings used daily;
  - (b) The coating manufacturer's formulation data for each coating on forms provided or approved by the director;

- (c) Daily records of the type and quantity of solvents for coating, thinning, purging and equipment cleaning used;
- (d) All test results to determine capture and control devices efficiencies, CEs and coating makeup;
- (e) Daily records of the type and quantity of waste solvents reclaimed or discarded daily;
- (f) Daily records of the quantity of pieces or materials coated daily; and/or
- (g) Any additional information pertinent to determining compliance.

**Monitoring:**

None

**Reporting:**

- (1) Records shall be made available to the director upon request.
  - (a) These records are not required to be certified by a responsible official.
- (2) The permittee shall report to St. Louis County Health Department Air Pollution Control Section at 111 S. Meramec Ave., Clayton, MO 63105 and the Missouri Department of Natural Resources Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, no later than thirty (30) days after the discovery of any exceedance of the primer or topcoat VOC limits required in Emission Limitations.

<b>Permit Condition EU0060-004</b>
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10 CSR 10-6.060
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<b><u>Air Construction Permits</u></b>
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- 1) **Requirements of the Construction Permit Numbers: #'s 1490, 1624, 1621, 1473, 1474, 1475, 1207, 1042, 1709, 1668**

**Emission Limitations:**

None

**Record Keeping:**

None

**Monitoring:**

None

**Reporting:**

None

- 2) **Requirements of the Construction Permit Number: #1780 (Large Parts Paint Booth – Operating Permit #5771)**

**Emission Limitations:**

Booth is limited to seven thousand (7,000) gallons of aerospace topcoats, primers and specialty coatings per twelve (12) month rolling period.

**Record Keeping:**

- (a) Monthly records of gallons of aerospace topcoats, primers and specialty coating used in this booth that demonstrate compliance with the above emission limitation.

- (b) Records that show compliance with 10-5.330.
- (c) Records that show the twelve (12) month rolling average of gallons of aerospace topcoats, primers and specialty coatings used.
- (d) Records shall be maintained for a period of five (5) years.
- (e) Records shall be made available to St. Louis County Air Pollution Control Program Manager upon request.

**Monitoring:**

None

**Reporting:**

The permittee shall report to the St. Louis County Health Department Air Pollution Control Section at 111 S. Meramec Ave., Clayton, MO 63105 and the Missouri Department of Natural Resources Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, no later than thirty (30) days after the discovery of any exceedance of the gallon limit under Emission Limitations.

**3) Requirements of the Construction Permit Number: #6259 (Paint and Adhesive Booth)**

**Emission Limitations:**

VOC and HAP emissions are limited to 1.75 tons per year from aerospace topcoats, primers and specialty coatings on a 12 month rolling average.

**Record Keeping:**

- (a) Permittee shall maintain monthly records of aerospace topcoats, primers and specialty coatings usage and VOC and HAP content per gallon, on site, for the latest twenty-four (24) month period, which clearly demonstrates compliance with the Emission Limitation above.
- (b) Records shall be complete within ten (10) days of the end of each month.

**Monitoring:**

None

**Reporting:**

If the records indicate that a violation of the emission limitation or standards of this permit has occurred, the permittee shall notify the St. Louis County Department of Health Air Pollution Control Program Manager by no later than the next working day. This notification is not required to be certified by a responsible official.

**4) Requirements of the Construction Permit Number: #5739 (Paint Spray Booth)**

**Emission Limitations:**

Emissions of VOC and HAP from aerospace topcoats, primers and specialty coatings are limited to three and two tenths (3.2) tons per year on a twelve month (12) rolling average.

**Record Keeping:**

- (1) Monthly records must be maintained that meet the following requirements:
  - (a) Demonstrate the status of compliance with the above emission limitation.
  - (b) Records must be complete within ten (10) days of the end of each month.

- (c) Records that indicate the per twelve (12) month rolling average of VOC and HAP emissions from the aerospace topcoats, primers and specialty coatings used.
- (d) Records must be maintained for the latest sixty (60) month period.

**Monitoring:**

None

**Reporting:**

Should records indicate a violation of the above emission limitation, 10 CSR 10-5.330, or 40 CFR Part 63, subpart GG has occurred, the permittee shall notify the St. Louis County Department of Health Air Pollution Control Program Manager by no later than the next working day.

This notification is not required to be certified by a responsible official.

**5) Requirements of the Construction Permit Number: #'s 3221, 3275, 3276, 3277, 6324, 6447 (Building 48 Spray Paint Booth)**

**Emission Limitations:**

- (1) Emissions of VOCs from aerospace topcoats, primers and specialty coatings are limited to less than eighteen (18) tons per year, on a twelve month rolling average.
- (2) Emissions of any individual HAP from aerospace topcoats, primers and specialty coatings are limited to less than ten (10) tons per year, on a twelve month rolling average.
- (3) Emissions of any combination of HAPs from aerospace topcoats, primers and specialty coatings are limited to less than eighteen (18) tons per year, on a twelve month rolling average.

**Record Keeping:**

- (1) Monthly and per twelve (12) month rolling period records of all aerospace topcoats, primers and specialty coatings utilized in the paint booths shall be maintained. These records shall include:
  - (a) The amounts utilized.
  - (b) The VOC and HAP(s) content of each material.
  - (c) Monthly calculations which demonstrate compliance with the limits established in the above Emissions Limitations.
  - (d) Records must be maintained for the latest sixty (60) month period.

**Monitoring:**

None

**Reporting:**

Should the records indicate that a violation of any limit established in the above Emission Limitations has occurred, the permittee shall notify the St. Louis County Department of Health Air Pollution Control Program Manager by no later than the next working day.

This notification is not required to be certified by a responsible official.

**6) Requirements of the Construction Permit Number: #1366 (Operating Permit #5331 Special Project Lab - Spray Paint Booth)**

**Emission Limitations:**

Unit is limited to 0.62 tons VOC emitted from topcoats, primers and specialty coatings per year or 2,080 hours of operation per twelve (12) month rolling average.

**Record Keeping:**

(1) Monthly and per twelve (12) month rolling period records of all aerospace topcoats, primers and specialty coatings utilized in the paint booths shall be maintained.

These records shall include:

- (a) The amounts utilized.
- (b) The VOC content of each material.
- (c) Monthly calculations which demonstrate compliance with the limits established in the above Emissions Limitations.
- (d) Records must be maintained for the latest sixty (60) month period.

**Monitoring:**

None

**Reporting:**

The permittee shall report to the St. Louis County Health Department Air Pollution Control Section at 111 S. Meramec Ave., Clayton, MO 63105 and the Missouri Department of Natural Resources Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, no later than thirty (30) days after the discovery of any exceedance of the VOC limit required by Emission Limitations.

**7) Requirements of the Construction Permit Number: #1369 (Spray Paint Booth Building 66 - Operating Permit # 5368)**

**Emission Limitations:**

Unit is limited to 2 tons VOC emitted from topcoats, primers and specialty coatings per year or 2,080 hours of operation per twelve (12) month rolling period.

**Record Keeping:**

(1) Monthly and per twelve (12) month rolling period records of all aerospace topcoats, primers and specialty coatings utilized in the paint booths shall be maintained.

These records shall include:

- (a) The amounts utilized.
- (b) The VOC and HAP(s) content of each material.
- (c) Monthly calculations which demonstrate compliance with the limits established in the above Emissions Limitations.
- (d) Records must be maintained for the latest sixty (60) month period.

**Monitoring:**

None

**Reporting:**

The permittee shall report to the St. Louis County Department of Health Air Pollution Control Section, 111 South Meramec, Clayton, MO, 63105 no later than thirty (30)

days after the discovery of any exceedance of the VOC limit required by Emission Limitations.

**8) Requirements of the Construction Permit Number: #1754 (Paint Spray Booth Building- Operating Permit #5737)**

**Emission Limitations:**

Unit is limited to 12.5 tons VOC emitted from topcoats, primers and specialty coatings per year or 2,000 hours of operation per twelve (12) month rolling period.

**Record Keeping:**

(1) Monthly and per twelve (12) month rolling period records of all aerospace topcoats, primers and specialty coatings utilized in the paint booths shall be maintained.

These records shall include:

- (a) The amounts utilized.
- (b) The VOC content of each material.
- (c) Monthly calculations which demonstrate compliance with the limits established in the above Emissions Limitations.
- (d) Records must be maintained for the latest sixty (60) month period.

**Monitoring:**

None

**Reporting:**

The permittee shall report to the St. Louis County Health Department Air Pollution Control Section at 111 S. Meramec Ave., Clayton, MO 63105 and the Missouri Department of Natural Resources Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, no later than thirty (30) days after the discovery of any exceedance of the VOC limit required by Emission Limitations.

**9) Requirements of the Construction Permit Number: #5988 (Paint Spray Booth)**

**Emission Limitations:**

Topcoats, primers and specialty coatings usage is limited to 2,000 gallons per twelve (12) month rolling period.

**Record Keeping:**

(1) Monthly and per twelve (12) month rolling period records of all aerospace topcoats, primers and specialty coatings utilized in the paint booths shall be maintained.

These records shall include:

- (a) The amounts utilized.
- (b) The VOC and HAP(s) content of each material.
- (c) Monthly calculations which demonstrate compliance with the limits established in the above Emissions Limitations.
- (d) Records must be maintained for the latest sixty (60) month period.

**Monitoring:**

None

**Reporting:**

The permittee shall report to the St. Louis County Health Department Air Pollution Control Section at 111 S. Meramec Ave., Clayton, MO 63105 and the Missouri Department of Natural Resources Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, no later than thirty (30) days after the discovery of any exceedance of the topcoats, primers and specialty coatings usage limit required by Emission Limitations.

**10) Requirements of the Construction Permit Number: #6208 (Robotic Paint Spray Booth)**

**Emission Limitations:**

Topcoats, primers and specialty coatings usage is limited to 39,990 pounds of VOC emitted per year, on a twelve (12) month rolling average.

**Record Keeping:**

(1) Recordkeeping to show daily compliance with 10 CSR 10-5.330.

(a) Monthly records of topcoats, primers and specialty coatings usage and VOC content, as well as the twelve (12) month rolling average shall be maintained on site.

(b) Monthly records shall be made available to St. Louis County Program Manager or his designated agent at any reasonable time.

**Monitoring:**

None

**Reporting:**

Should records indicate that a violation of 10 CSR 10-5.330, or the Emission Limitation above has occurred, the permittee must notify St. Louis County Health Department Air Pollution Control Section at 111 S. Meramec Ave., Clayton, MO 63105 and the Missouri Department of Natural Resources Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, by no later than the next working day.

This notification is not required to be certified by a responsible official.

**11) Construction Permit Number: #1753 (Large Paint Spray Booth Building 248 - Operating Permit # 5741)**

**Emission Limitations:**

This unit is limited to 4.6 tons of VOC emissions from topcoat, primer and specialty coating emissions per year or 2,000 hours of operation twelve (12) month rolling period.

**Record Keeping:**

(1) Monthly and per twelve (12) month rolling period records of all aerospace topcoats, primers and specialty coatings utilized in the paint booths shall be maintained.

These records shall include:

(a) The amounts utilized.

(b) The VOC content of each material.

(c) Monthly calculations which demonstrate compliance with the limits established in the above Emissions Limitations.

(d) Records must be maintained for the latest sixty (60) month period.

**Monitoring:**

None

**Reporting:**

The permittee shall report to the St. Louis County Department of Health Air Pollution Control Section, 111 South Meramec, Clayton, MO, 63105 no later than thirty (30) days after the discovery of any exceedance of VOC limit required by Emission Limitations.

**II) State/Local Only Enforceable Requirements**

<b>Permit Condition EU0060-005</b>
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10 CSR 10-5.295
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<b>Control of Emissions From Aerospace Manufacture and Rework Facilities</b>
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**Emission Limitations:**

- (1) Specialty coatings shall be limited to VOC contents expressed in Table I of this rule. (See appendix 1)
- (2) Primers shall be limited to a VOC content of 350 grams per liter or 2.9 pounds per gallon (VOC content is measured less water and exempt solvent) as applied.
- (3) Topcoats shall be limited to a VOC content of 420 grams per liter or 3.5 pounds per gallon (VOC content is measured less water and exempt solvent) as applied.

**Record Keeping:**

- (1) The permittee shall maintain a list of coatings in use with category and VOC content as applied.
- (2) The permittee shall record coating usage on a monthly basis.
- (3) The permittee shall maintain records of monthly volume-weighted average VOC content for each regulated coating type included in averaging for coating operations that achieve compliance through coating averaging under this rule.

**Monitoring:**

None

**Reporting:**

The permittee shall report to the St. Louis County Health Department Air Pollution Control Section at 111 S. Meramec Ave., Clayton, MO 63105 and the Missouri Department of Natural Resources Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, no later than thirty (30) days after discovery that the VOC content limit set in Emission Limitations.

**EU0070**  
**Coating Lines Alternate Operating Scenario A**

FIG POINT NUMBER	EMISSION UNIT NUMBER	FEDERAL				STATE	DESCRIPTION (for information only, this does not create any permit requirements)
		1) 40 CFR Part 63, Subpart GG and 10 CSR 10-6.075: Aerospace Manufacturing and Rework Facilities NESHAP - Primers and Topcoats	2) 10 CSR 10-5.050: Restriction of Emission of Particulate Matter from Industrial Processes	3) 10 CSR 10-5.330: Control of Emissions From Industrial Surface Coating Operations	4) Requirements of the Listed Construction Permits Obtained Under 10 CSR 10-6.060	1) 10 CSR 10-5.295: Control of Emissions From Aerospace Manufacture and Rework Facilities	
CL-002-02	SB-002-06	X	X	X	NA	X	Spray booth (maintenance) (sanding)
CL-060-01	SB-060-01	X	X	X	NA	X	Spray booth (cans of primer) (research and development)
CL-066-01	SB-066-02	X	X	X	#1366	X	Spray booth (research and development)
AS-STL-01	SB-101-29	X	X	X	#1324	X	Spray booth (sealants and adhesives)
CL-101-01	SB-101-03	X	X	X	NA	X	Lab hood for conformal coating of parts
CL-101-01	SB-101-44	X	X	X	NA	X	Spray booth (developers: ex: KPR Resist) (not primer or topcoat)
CL-101-03	SB-101-04	X	X	X	#5988	X	Spray booth (research and development)
CL-101-03	SB-101-43	X	X	X	#1474	X	Spray booth (robotic & hand applied) (research and development)
CL-101-03	SB-101-45	X	X	X	#6208	X	Robotic sprayer (research and development)
CL-102-01	SB-102-01	X	X	X	#1207	X	Bench spray booth (research & development)
CL-245-02	SB-245-02	X	X	X	#1709	X	Paint booth (maintenance)
CL-248-01	SB-248-01	X	X	X	#1753	X	Paint booth (mock-up) (research and development)
NONE	SB-101-10	X	X	X	#1668	X	Spray booth (Plasma spray coater) (research and development)
NONE	SB-101-34	X	X	X	NA	X	Spray booth (arc spray)

X = Applicable      NA = Not Applicable

### **DESCRIPTION OF ALTERNATE SCENARIO**

This alternate scenario allows these booths to be used for spray coating application of production parts with aerospace primers, topcoats and specialty coatings. These booths are currently used for an activity that is exempt from some or all of the requirements associated with aerospace production booths such as research and development, maintenance, or arc spray. The coating of aerospace production parts in any of these booths with aerospace primers, topcoats, and specialty coatings will subject these booths to the applicable requirements listed above.

### **COMPLIANCE REQUIREMENTS**

Applicable requirements are the same as listed above under Coating Lines.

<b>EU0080</b>					
<b>Fugitive Painting</b>					
<b>EIG POINT NUMBER</b>	<b>EMISSION UNIT NUMBER</b>	<b>FEDERAL</b>		<b>STATE</b>	<b>DESCRIPTION</b> (for information only, this does not create any permit requirements)
		1) 40 CFR Part 63, Subpart GG and 10-CSR 10-6.075: Aerospace Manufacturing and Rework Facilities NESHAP - Primers and Topcoats	2) 10-CSR 10-5.830: Control of Emissions from Industrial Surface Coating Operations	1) 10-CSR 10-5.295: Control of Emissions from Aerospace Manufacturing and Rework Facilities	
BF-STL-01	BF-STL-01	X	X	X	Plantwide Fugitive Painting

X = Applicable

NA = Not Applicable

### **COMPLIANCE REQUIREMENTS**

#### **I) Federally Enforceable Requirements**

<b>Permit Condition EU0080-001</b>
10 CSR 10-6.075 and 40 CFR Part 63, Subpart GG <b><i>Aerospace Manufacturing and Rework facilities NESHAP - Primers and Topcoats</i></b>

#### **Emission Limitations:**

##### **(1) Primers:**

- shall be limited to a VOC content of 350 grams per liter or 2.9 pounds per gallon (VOC content is measured less water and exempt solvent) as applied.
- shall be limited to an organic HAP content of 350 grams per liter or 2.9 pounds per gallon (organic HAP content is measured less water and exempt solvent) as applied.
- The VOC content may be used as a surrogate for the organic HAP content.

##### **(2) Topcoats:**

- (a) shall be limited to a VOC content of 420 grams per liter or 3.5 pounds per gallon (VOC content is measured less water and exempt solvent) as applied.
- (b) shall be limited to a VOC content of 420 grams per liter or 3.5 pounds per gallon (organic HAP content is measured less water and exempt solvent) as applied.
- (c) The VOC content may be used as a surrogate for the organic HAP content.
- (3) Averaging (as described in 63.745(e) (2) & 750 (d)) can be used to meet the Primer and Topcoat limits.
- (4) The usage of specialty coatings as defined in 40 CFR 63 Subpart GG is not covered by this rule.
- (5) Areas where it is not technically feasible to paint parts in a booth are not required to meet particulate control requirements of 63.745 (g)(1) through (g)(3). In addition to the exceptions listed in 63.745 (g)(i) through (g)(viii), the following operations are not feasible within a paint booth:
  - (a) The part is too large to be painted in a booth.
  - (b) The coatings are not spray applied.
  - (c) The part would need to be removed from a fixture/tool to be painted in a booth.
  - (d) Cycle time restrictions prior to subsequent operations make it time prohibitive to move the part to a paint booth.
  - (e) Other operations where engineering analysis recommends the part be painted outside of a booth.

**Record Keeping:**

- (1) Record the name and VOC content as applied of each primer and topcoat used in production areas.
- (3) For low HAP content primers and topcoats record keeping complying with 63.752 (c)(3) may be used.
- (4) If averaging is used to meet the primer and topcoat limits record keeping shall comply with 63.752 (c)(4).

**Monitoring:**

None

**Reporting:**

- (1) Every six (6) months:
  - (a) Report any times where primers or topcoats exceeded the appropriate VOC or organic HAP limit.
  - (b) If the operations have been in compliance for the semiannual period, (provide ) a statement that the operations have been in compliance with the applicable standards.

<b>Permit Condition EU0080-002</b>
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10 CSR 10-5.330
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<b>Control of Emissions From Industrial Surface Coating Operations</b>
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**Emission Limitations:**

- (1) Primers (as defined in 10 CSR 10-5.295) shall be limited to a VOC content of 6.0 lb/gal. (VOC content is measured less water and exempt solvents.)

- (2) Topcoats (as defined in 10 CSR 10-5.295) shall be limited to a VOC content of 5.0 lb/gal. (VOC content is measured less water and exempt solvents.)
- (3) Specialty coatings as defined per 10 CSR 10-5.295 are not subject to this rule.
- (4) This rule is expected to be modified to exempt Aerospace facilities. At the time those modifications take effect, this rule and all of the requirements of it are no longer considered to be an applicable requirement of this permit.

**Record Keeping:**

- (1) Follow the appropriate record keeping requirements detailing specific VOC sources as necessary for the director to determine daily compliance. These records may include:
  - (a) Daily records of the type and the quantity of coatings used daily;
  - (b) The coating manufacturer's formulation data for each coating on forms provided or approved by the director;
  - (c) Daily records of the type and quantity of solvents for coating, thinning, purging and equipment cleaning used;
  - (d) All test results to determine capture and control devices efficiencies, CEs and coating makeup;
  - (e) Daily records of the type and quantity of waste solvents reclaimed or discarded daily;
  - (f) Daily records of the quantity of pieces or materials coated daily; and
  - (g) Any additional information pertinent to determining compliance.

**Monitoring:**

None

**Reporting:**

- (1) Records shall be made available to the Director upon request.
  - (a) These records are not required to be certified by a responsible official.
- (2) The permittee shall report to the St. Louis County Health Department Air Pollution Control Section at 111 S. Meramec Ave., Clayton, MO 63105 and the Missouri Department of Natural Resources Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, no later than thirty (30) days after the discovery of any exceedance of the VOC limits required in Emission Limitations.

**II) State/Local Only Enforceable Requirements**

<b>Permit Condition EU0080-003</b>
10 CSR 10-5.295 <b><i>Control of Emissions From Aerospace Manufacturing and Rework Facilities</i></b> <b><u>Emission Limitations:</u></b> <ol style="list-style-type: none"><li>(1) Specialty coatings shall be limited to a VOC content as expressed in Table I of this rule. (See Appendix 1)</li><li>(2) Primers shall be limited to a VOC content of 350 grams per liter or 2.9 pounds per gallon (VOC content is measured less water and exempt solvent) as applied.</li><li>(3) Topcoats shall be limited to a VOC content of 420 grams per liter or 3.5 pounds per gallon (VOC content is measured less water and exempt solvent) as applied.</li></ol>

**Record Keeping:**

- (1) The permittee shall maintain a list of coatings in use with category and VOC content as applied.
- (2) The permittee shall record coating usage on a monthly basis.
- (3) The permittee shall maintain records of monthly volume-weighted average VOC content for each regulated coating type included in averaging for coating operations that achieve compliance through coating averaging under this rule.

**Monitoring:**

None

**Reporting:**

The permittee shall report to the St. Louis County Health Department Air Pollution Control Section at 111 S. Meramec Ave., Clayton, MO 63105 and the Missouri Department of Natural Resources Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, no later than thirty (30) days after the discovery of any exceedance of Emission Limitations.

**EU0090**  
**Combustion Sources**

EIG POINT NUMBER	EMISSION UNIT NUMBER	FEDERAL			DESCRIPTION (for information only, this does not create any permit requirements)
		1) 40 CFR Part 60 Subpart Dc and 10 CSR 10-6.070: Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units	2) 10 CSR 10-5.060: Refuse Not to be Burned in Fuel Burning Installations	3) Requirements of the Listed Construction Permits Obtained Under 10 CSR 10-6.060	
CS-005-01	CS-005-02	NA	X	#1321	Coal/natural gas/fuel oil boiler (76.4 MMBTU/hr)
CS-005-01	CS-005-03	NA	X	#1321	Coal/natural gas/fuel oil boiler (76.4 MMBTU/hr)
CS-005-01	CS-005-04	NA	X	#1321	Coal/natural gas/fuel oil boiler (76.4 MMBTU/hr)
CS-005-05	CS-005-05	NA	X	NA	Natural gas/fuel oil boiler (77.0 MMBTU/hr)
CS-048-01	CS-048-01	X	X	#6358	Natural gas boiler (25.1 MMBTU/hr)
CS-101-01	CS-101-01	NA	X	NA	Natural gas boiler (52.0 MMBTU/hr)
CS-101-01	CS-101-02	NA	X	NA	Natural gas boiler (52.0 MMBTU/hr)
CS-101-03	CS-101-03	NA	X	NA	Natural gas boiler (20.8 MMBTU/hr)

EIG POINT NUMBER	EMISSION UNIT NUMBER	FEDERAL			DESCRIPTION  (for information only, this does not create any permit requirements)
		1) 40 CFR Part 60 Subpart Dc and 10 CSR 10-6.070: Standards of Performance for Small Industrial-Commercial-Generating Units	2) 10 CSR 10-5.060: Refuse Not to be Burned in Fuel Burning Installations	3) Requirements of the Listed Construction Permits Obtained Under 10 CSR 10-6.060	
CS-101-03	CS-101-04	NA	X	NA	Natural gas boiler (20.8 MMBTU/hr)
CS-102-01	CS-102-01	NA	X	NA	Natural gas boiler (79.6 MMBTU/hr)
CS-102-02	CS-102-02	NA	X	NA	Natural gas boiler (33.476 MMBTU/hr)
CS-102-02	CS-102-03	NA	X	NA	Natural gas boiler (25.2 MMBTU/hr)
CS-110-01	CS-110-01	NA	X	#0865	Natural gas boiler (10.461 MMBTU/hr)
CS-110-01	CS-110-02	NA	X	#0865	Natural gas boiler (10.461 MMBTU/hr)
CS-111-01	CS-111-01	NA	X	#1332	Natural gas boiler (16.8 MMBTU/hr)
CS-111-01	CS-111-02	NA	X	#1332	Natural gas boiler (16.8 MMBTU/hr)
CS-STL-01	CS-STL-01A	NA	X	NA	Plantwide combustion (indirect natural gas)
CS-STL-01	CS-STL-01C	NA	X	NA	Plantwide combustion (propane)
CS-STL-01	CS-025-01	NA	X	NA	Natural gas boiler (8.5 MMBTU/hr)
CS-STL-01	CS-066-01	NA	X	NA	Natural gas boiler/FO back-up (6.3 MMBTU/hr)
CS-STL-01	CS-066-02	NA	X	NA	Natural gas boiler/FO back-up (6.3 MMBTU/hr)
CS-STL-01	CS-066-03	NA	X	NA	Natural gas boiler (6.3 MMBTU/hr)
CS-STL-01	CS-066-04	NA	X	NA	Natural gas boiler (6.3 MMBTU/hr)
CS-STL-01	CS-111-03	NA	X	#1333	Natural gas boiler (6.3 MMBTU/hr)
CS-STL-01	CS-221-01	NA	X	NA	Natural gas boiler (3.3475 MMBTU/hr)
CS-STL-01	CS-221-02	NA	X	NA	Natural gas boiler (3.3475 MMBTU/hr)

X = Applicable      NA = Not Applicable

## **COMPLIANCE REQUIREMENTS**

### **I) Federally Enforceable Requirements**

#### **Permit Condition EU0090-001**

10 CSR 10-6.070 and 40 CFR Part 60 Subpart Dc

***Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units***

#### **Emission Limitations:**

None

#### **Record Keeping:**

The permittee shall collect annual fuel consumption readings for the natural gas meter that includes the steam clean aircraft boiler. This consumption data includes natural gas consumption from other sources (i.e. hot water heaters). These records shall be maintained by the permittee for a period of two years.

#### **Monitoring:**

None

#### **Reporting:**

None

#### **Permit Condition EU0090-002**

10 CSR 10-6.060

***Air Construction Permits***

### **1) Requirements of the Construction Permit Numbers: #0865, #1332, #1333 & #6358**

#### **Emission Limitations:**

None

#### **Record Keeping:**

None

#### **Monitoring:**

None

#### **Reporting:**

None

### **2) Requirements of the Construction Permit Number: #1321**

#### **Emission Limitations:**

(1) The existing chain grate coal-fired boiler was removed.

(2) The maximum hourly heat input of the modified boilers while burning coal is limited as follows:

(a) From April 1 to October 31 –  $110.2 \times 10^6$  BTU/HR averaged over 24 hours.

(b) From November 1 to March 31 –  $122.4 \times 10^6$  BTU/HR averaged over 24 hours.

(3) The sulfur content of the coal burned shall not exceed one percent (1%).

(4) Sulfur dioxide emissions are limited to 217.5 pounds per hour, and 1.76 pounds per million BTUs of hourly heat input while burning coal.

- (5) Nitrogen dioxide emissions are limited to 1.0 pounds per million BTU's of hourly heat input while burning coal.
- (6) Emissions testing was performed (1/18/85).
- (7) A post construction monitoring site for sulfur dioxide was established and operated for one (1) year.
- (8) A plan was submitted (8/12/85) for assuring continuing compliance with the nitrogen dioxide emission limitation above.
- (9) The ash content of the coal burned shall not exceed twelve (12) percent by weight.
- (10) Alternate fuels can be burned. (Including: natural gas, fuel oil, and off-spec. jet fuel.)

**Record Keeping:**

- (1) The permittee shall maintain monthly or daily as required records of the following:
  - (a) amount of coal burned daily
  - (b) sulfur content of the coal
  - (c) ash content of the coal
  - (d) heating value of the coal in BTU/lb
  - (e) The maximum hourly heat input of the modified boilers while burning coal:
- (2) Records shall be maintained for a sixty (60) month period.

**Monitoring:**

Test method contained in 10 CSR 10-6.040(1) (ASTM D 3177-75)) or other director-approved method should be used to determine compliance with sulfur content of coal.

**Reporting:**

- (1) Monthly fuel usage and analysis reports shall be submitted to the local agency within 15 days of the end of each month, or as approved by the St. Louis County Air Pollution Control Program and the Missouri Department of Natural Resources Air Pollution Control Program. The reports shall include:
  - (a) amount of coal burned daily
  - (b) sulfur content of the coal
  - (c) ash content of the coal
  - (d) heating value of the coal in BTU/lb
  - (e) These reports are not required to be certified by a responsible official.
- (2) The permittee shall report to the St. Louis County Health Department Air Pollution Control Section at 111 S. Meramec Ave., Clayton, MO 63105 and the Missouri Department of Natural Resources Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, no later than thirty (30) days after the discovery of any exceedance of the Emission Limitations.

**EU0100**  
**Depainting Operations**

FIG POINT NUMBER	EMISSION UNIT NUMBER	FEDERAL	DESCRIPTION  (for information only, this does not create any permit requirements)
		1) & 2) 40 CFR Part 63, Subpart GG and 10 CSR 10-6.075: Aerospace Manufacturing and Rework Facilities NESHAP	
MC-STL-01	MC-STL-01	X	Plantwide chemical depainting
NONE	DP-STL-01	X	Plantwide mechanical depainting

X = Applicable      NA = Not Applicable

**COMPLIANCE REQUIREMENTS**

**I) Federally Enforceable Requirements**

<b>Permit Condition EU0100-001</b>
10 CSR 10-6.075 and 40 CFR Part 63, Subpart GG <b><i>Aerospace Manufacturing and Rework Facilities NESHAP (When 7 or more completed aerospace vehicles are depainted in a calendar year and when 6 or less completed aerospace vehicles are depainted in a calendar year this does not apply)</i></b>

**Emission Limitations:**

- (1) On an average annual basis, no more than 26 gallons (or 190 pounds) of organic HAP containing chemical strippers per completed commercial aircraft depainted or no more than 50 gallons (or 360 pounds) of organic HAP containing chemical strippers per completed military aircraft depainted may be used for spot stripping and decal removal.
- (2) Nonchemical based depainting equipment shall be operated and maintained according to the manufacturer's specifications or locally prepared operating procedures. During periods of malfunctions, use substitute materials during the repair period which minimize organic HAP emissions. Substitute materials can be used for no more than fifteen (15) days annually, unless such materials are organic HAP-free.
- (3) Depainting operations that generate airborne inorganic HAP emissions from dry media blasting must comply with 63.746 (b)(4)(i) through (v).
- (4) Mechanical and hand sanding operations are exempt from the requirements of 63.746 (b)(4).

**Record Keeping:**

(1) General

(a) Record for all chemical strippers used in the depainting operation:

1. The name of each chemical stripper
2. For spot stripping and decal removal, the volume of organic HAP containing chemical stripper or weight of organic HAP used, the annual average volume of organic HAP-containing stripper or weight of organic HAP used per aircraft, the annual number of aircraft stripped, and all data and calculations used.

(2) Mechanical Depainting

(a) If dry media blasting equipment is used to comply with the organic HAP emission limit specified in 63.746(b)(1), record:

1. The names and types of nonchemical based equipment; and
2. For periods of malfunction,
  - a. The nonchemical method or technique that malfunctioned;
  - b. The date that the malfunction occurred;
  - c. A description of the malfunction;
  - d. The methods used to repaint aerospace vehicles during the malfunction period;
  - e. The dates that these methods were begun and discontinued; and
  - f. The date that the malfunction was corrected.

(b) Record the pressure drop (either electronically or manually) once each operating shift that inorganic HAP containing primer or topcoat is spray applied.

1. The pressure drop records are deemed to be complete if 95% of the readings are recorded for all of the booths subject to this rule in any six (6) month period. If the last reading taken correctly prior to any group of missed readings and the first reading taken correctly after the same group of missed readings are both below the pressure drop limit, the missed readings are assumed to be below the pressure drop limit.
2. For this provision, a shift is an 8 hour period (12:00 midnight to 8:00 AM, 8:00 AM to 4:00 PM, and 4:00 PM to 12:00 midnight).

**Monitoring:**

None

**Reporting:**

(1) Submit a semiannual report that identifies:

(a) For periods of malfunctions of dry media blasting equipment:

1. The nonchemical method or technique that malfunctioned;
2. The date that the malfunction occurred;
3. A description of the malfunction;
4. The methods used to repaint aerospace vehicles during the malfunction period;
5. The dates that these methods were begun and discontinued; and
6. The date that the malfunction was corrected;

(b) All periods where a nonchemical repainting operation subject to 63.746

(b)(2) and (b)(4) for the control of inorganic HAP emissions was not

immediately shut down when the pressure drop was outside the limit(s) specified by the filter or booth manufacturer or in locally prepared operational procedures;

- (c) A list of new and discontinued aircraft models depainted at the facility over the last 6 months and a list of the parts normally removed or depainting for each new aircraft model being depainted; and
  - (d) If the depainting operation has been in compliance for the semiannual period, a statement signed by a responsible company official that the operation was in compliance with the applicable standards.
- (2) Submit an annual report that identifies:
- (a) The average volume per aircraft of organic HAP-containing chemical strippers or weight of organic HAP used for spot stripping and decal removal operations if it exceeds the limits specified in 63.746 (b)(3); and
  - (b) The number of times the pressure drop limit(s) for each filter system were outside the limits specified by the filter or booth manufacturer or in locally prepared operating procedures.

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**EU0110**  
**Emergency Generators**

EIG POINT NUMBER	EMISSION UNIT NUMBER	FEDERAL	DESCRIPTION  (for information only, this does not create any permit requirements)
		1) 10 CSR 10-5.180: Emission of Visible Air Contaminants From Internal Combustion Engine	
NONE	EG-002-01	X	Diesel emergency generator
NONE	EG-002-02	X	Diesel emergency generator (in shed)
NONE	EG-009-01	X	Diesel emergency generator
NONE	EG-009-02	X	Diesel emergency generator (for pump)
NONE	EG-020-01	X	Diesel emergency generator
NONE	EG-026-01	X	Diesel emergency generator (for fire pump)
NONE	EG-029-01	X	Natural gas emergency generator
NONE	EG-029A-02	X	Natural gas emergency generator (200HP)
NONE	EG-033-01	X	Diesel emergency generator
NONE	EG-034-01	X	Diesel emergency generator
NONE	EG-045-01	X	Diesel emergency generator
NONE	EG-056-01	X	Diesel emergency generator (50 HP)
NONE	EG-064-01	X	Natural gas emergency generator (250 HP @ 1880 RPM)
NONE	EG-066-01	X	Natural gas emergency generator (250 HP)
NONE	EG-066-02	X	Diesel emergency generator (for fire pump)
NONE	EG-067-01	X	Diesel emergency generator
NONE	EG-101-01	X	Diesel emergency generator
NONE	EG-101A-01	X	Natural gas emergency generator
NONE	EG-102-01	X	Diesel emergency generator
NONE	EG-103-01	X	Diesel emergency generator
NONE	EG-106-01	X	Diesel emergency generator
NONE	EG-107-01	X	Diesel emergency generator
NONE	EG-110-01	X	Natural gas emergency generator
NONE	EG-111-01	X	Diesel emergency generator
NONE	EG-122-01	X	Diesel emergency generator
NONE	EG-220-01	X	Diesel emergency generator
NONE	EG-HQ-01	X	Diesel emergency generator

X = Applicable      NA = Not Applicable

## COMPLIANCE REQUIREMENTS

### I) Federally Enforceable Requirements

#### **Permit Condition EU0110-001**

10 CSR 10-5.180

#### ***Emission of Visible Air Contaminants From Internal Combustion Engine***

##### **Emission Limitations:**

No person shall cause or permit the emission of visible air contaminants from any internal combustion engine for more than ten (10) consecutive seconds at any one (1) time. Where the presence of uncombined water is the only reason for failure of an emission to meet the requirements of this regulation, the provisions of this regulation shall not apply.

##### **Record Keeping:**

None

##### **Monitoring:**

None

##### **Reporting:**

The permittee shall report to the St. Louis County Department of Health Air Pollution Control Section, 111 South Meramec, Clayton, MO, 63105 no later than thirty (30) days after the discovery of any exceedance of visible air contaminants requirements of Emission Limitations.

#### **EU0120**

#### **Handling Of Hazardous Waste**

EIG POINT NUMBER	EMISSION UNIT NUMBER	FEDERAL	DESCRIPTION  (for information only, this does not create any permit requirements)
		1) 40 CFR Part 63, Subpart GG and 10 CSR 10-6.075: Aerospace Manufacturing and Rework Facilities NESHAP - Hazardous Waste Handling	
NONE	HW-STL-01	X	Plantwide handling of hazardous waste

X = Applicable      NA = Not Applicable

## COMPLIANCE REQUIREMENTS

### I) Federally Enforceable Requirements

**Permit Condition EU0120-001**

10 CSR 10-6.075 and 40 CFR Part 63, Subpart GG

**Aerospace Manufacturing and Rework Facilities NESHAP – Hazardous Waste Handling**

**Emission Limitations:**

All waste that contains HAP, but is not subject to RCRA standards, shall be handled and transferred to or from containers, vats, vessels, and piping systems in such a manner that minimizes spills.

**Record Keeping:**

None

**Monitoring:**

None

**Reporting:**

None

**EU0130**

Hazardous Waste Shelter

EIG POINT NUMBER	EMISSION UNIT NUMBER	FEDERAL	DESCRIPTION  (for information only, this does not create any permit requirements)
		1) 40 CFR Part 63, Subpart DD and 10 CSR 10-6.075: Off-Site Waste NESHAP	
NONE	MS-027-04	X	Hazardous waste shelter

X = Applicable

NA = Not Applicable

**COMPLIANCE REQUIREMENTS**

**I) Federally Enforceable Requirements**

**Permit Condition EU0130-001**

10 CSR 10-6.075 and 40 CFR Part 63, Subpart DD

**Off-site Waste NESHAP**

**Emission Limitations:**

- (1) Regulated level 1 containers (drums) must be equipped with a cover and closure devices that form a continuous barrier over the container openings such that there are no visible holes, gaps, etc.
- (2) After discrete batches of material are added to the container, promptly secure the closure devices in the closed position and/or install covers.

**Record Keeping:**

None

**Monitoring:**

- (1) Inspect regulated level 1 containers (drums) to check for visible holes, gaps, or other open spaces on the date they arrive from offsite.
- (2) When a defect is found, efforts shall be made within the first 24 hours to repair it. If the defect is not repaired then the regulated material must be removed and the container taken out of service, no later than 5 calendar days after detection of the defect. The emptied defective container must be either repaired, destroyed, or used for purposes other than management of regulated material.

**Reporting:**

None

EU0140 Chemical Milling Maskants						
		FEDERAL			STATE	DESCRIPTION  (for information only, this does not create any permit requirements)
EIG POINT NUMBER	EMISSION UNIT NUMBER	1) 40 CFR Part 69, Subpart GG and 10 CSR 10-6.015: Aerospace Manufacturing and Rework Facilities NESHAP - Chemical Milling Maskant	2) 10 CSR 10-5.330: Control of Emissions From Industrial Surface Coating Operations	3) Requirements of the Listed Construction Permits Obtained Under 10 CSR 10-6.060	1) 10 CSR 10-5.295: Control of Emissions From Aerospace Manufacture and Rework Facilities	
ML-051-01	ML-051-01	X	X	#6326	X	Large waterbased maskant line
ML-051-01	SB-051-01	X	X	#6326	X	Maskant spray booth
NONE	ML-051-02	X	X	NA	X	Small wasterbased maskant line

X = Applicable      NA = Not Applicable

## **COMPLIANCE REQUIREMENTS**

### **I) Federally Enforceable Requirements**

<b>Permit Condition EU0140-001</b>
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10 CSR 10-6.075 and 40 CFR Part 63, Subpart GG
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<b><i>Aerospace Manufacturing and Rework Facilities NESHAP – Chemical Milling Maskant</i></b>
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**Emission Limitations:**

(1) VOC emissions from chemical milling maskants shall be limited to no more than 160 grams of organic HAP per liter (1.3 lb/gal).

(a) This limit does not apply to:

1. Touch-up of scratched surfaces or damaged maskant; or
2. Touch-up of trimmed edges.

(2) The permittee shall conduct the handling and transfer of chemical milling maskants to or from containers, tanks, vats, vessels, and piping systems in such a manner that minimizes spills.

**Record Keeping:**

Chemical milling maskant purchasing records including monthly amount purchased and VOC content shall be maintained.

**Monitoring:**

None

**Reporting:**

- (1) Semi-Annual Report
- (2) Annual Report

<b>Permit Condition EU0140-002</b>
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10 CSR 10-5.330
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<b><i>Control of Emissions From Industrial Surface Coating Operations</i></b>
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**Emission Limitations:**

(1) Emissions from chemical milling maskant are limited to 1.0 lb VOC/gal.

(2) This rule is expected to be modified to exempt Aerospace facilities. At the time those modifications take effect, this rule and all of the requirements of it are no longer considered to be an applicable requirement of this permit.

**Record Keeping:**

Records to demonstrate daily compliance must be maintained. Records showing that all chemical milling maskants used comply with the emission limitation are sufficient to show daily compliance.

**Monitoring Requirements:**

None

**Reporting Requirements:**

The permittee shall report to the St. Louis County Health Department Air Pollution Control Section at 111 S. Meramec Ave., Clayton, MO 63105 and the Missouri

Department of Natural Resources Air Pollution Control Program, P.O. Box 176,  
Jefferson City, MO 65102-0176, no later than thirty (30) days after the discovery of  
any exceedance of the VOC content requirements of Emission Limitations.

**Permit Condition EU0140-003**

10 CSR 10-6.060

***Air Construction Permits***

**1) Requirements of the Construction Permit Number: #6326**

**Emission Limitations:**

Emissions are limited, on a twelve (12) month rolling average, to eight and one tenth  
(8.1) ton each of VOC and HAP.

**Record Keeping:**

(1) Monthly records of all chemical milling maskants utilized in the maskant  
operations, including:

- (a) The amounts of each material
- (b) The VOC and HAP content of each material
- (c) Calculations, which, demonstrate compliance with the emission limitation  
above.
- (d) Records showing the twelve month rolling average of emissions of VOC and  
HAP.
- (e) The records for the latest sixty (60) month period.

**Monitoring:**

None

**Reporting:**

Should the records indicate that a violation of any of the limits established in the  
emission limitation above has occurred, the permittee shall notify the St. Louis  
County Health Department Air Pollution Control Section at 111 S. Meramec Ave.,  
Clayton, MO 63105 and the Missouri Department of Natural Resources Air Pollution  
Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, by no later than the  
next working day.

This notification is not required to be certified by a responsible official.

**II) State/Local Only Enforceable Requirements**

**Permit Condition EU0140-004**

10 CSR 10-5.295

***Control of Emissions From Aerospace Manufacture and Rework Facilities***

**Emission Limitations:**

- (1) VOC emissions from chemical milling maskants shall be limited to no more  
than 160 grams of organic HAP per liter (1.3 lb/gal).
  - (a) This limit does not apply to:
    - 1. Touch-up of scratched surfaces or damaged maskant; or
    - 2. Touch-up of trimmed edges.

- (2) The permittee shall conduct the handling and transfer of chemical milling maskants to or from containers, tanks, vats, vessels, and piping systems in such a manner that minimizes spills.

**Record Keeping:**

Purchasing records including monthly amount purchased and VOC content shall be maintained.

**Monitoring:**

None

**Reporting:**

The permittee shall report to the St. Louis County Health Department Air Pollution Control Section at 111 S. Meramec Ave., Clayton, MO 63105 and the Missouri Department of Natural Resources Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, no later than thirty (30) days after the discovery of any exceedance of the VOC content requirements in Emission Limitations.

**EU0150**

**Particulate Emitting Sources**

EIG POINT NUMBER	EMISSION UNIT NUMBER	FEDERAL		DESCRIPTION (for information only, this does not create any permit requirements)
		1) 10 CSR 10-5.050 Restriction of Emission of Particulate Matter From Industrial Processes	2) Requirements of the Listed Construction Permits Obtained Under 10 CSR 10-6.060	
NONE	GB-027-02	X	NA	Walk-in grit blaster

X = Applicable      NA = Not Applicable

**COMPLIANCE REQUIREMENTS**

**I) Federally Enforceable Requirements**

**Permit Condition EU0150-001**

10 CSR 10-5.050

**Restriction of Emission of Particulate Matter From Industrial Processes**

**Emission Limitations:**

- (1) Units must meet one of the following limits:
- (a) The emission rate of 17.199 lb particulate matter/hour; or
  - (b) The concentration of 0.100 grains/scf.

**Record Keeping:**

Maintain a copy of one-time compliance demonstration calculations.

**Monitoring:**

None

**Reporting:**

The permittee shall report to the St. Louis County Health Department Air Pollution Control Section at 111 S. Meramec Ave., Clayton, MO 63105 and the Missouri Department of Natural Resources Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, no later than ten (30) days after the discovery of any exceedance of the particulate matter emission limit required under Emission Limitation.

EU0160 Chromic Acid Anodize Tank			
EIG POINT NUMBER	EMISSION UNIT NUMBER	FEDERAL	DESCRIPTION  (for information only, this does not create any permit requirements)
		10-40 CFR Part 63, Subpart N and 10 CSR 10-6.075: Chrome NESHAP	
PT-027-05	IT-027-08A	X	Immersion tank 9 in the aluminum line

X = Applicable      NA = Not Applicable

**COMPLIANCE REQUIREMENTS**

**I) Federally Enforceable Requirements**

Permit Condition EU0160-001
10 CSR 10-6.075 and 40 CFR Part 63 Subpart N Chrome NESHAP

**Emission Limitations:**

- (1) The surface tension of the tank shall be maintained at or below 45 dynes/cm.
- (2) The permittee shall maintain and follow an operation and maintenance plan.

**Record Keeping:**

The hours of operation for the chrome anodize tank shall be recorded.

**Monitoring:**

- (1) The surface tension shall be periodically monitored based on the alternate monitoring schedule from Table 2 of the operation and monitoring plan:

**Table 2 Alternative Monitoring Requirements**

<b>Inspection Level</b>	<b>Time of Continuous Anodize Tank Operation at Less Than or Equal to 45 dynes/cm (1), (3)</b>	<b>Frequency of Surface Tension Readings (4)</b>	<b>Actions Required Based on Results of Surface Tension Reading</b>
Level 1	0 to 40 hours	Twice a day	If the surface tension readings are less than or equal to 45 dynes/cm after 40 hours of operation, then proceed to Inspection Level 2.
Level 2	41 to 80 hours	Once a day	If the surface tension readings are less than or equal to 45 dynes/cm after 80 hours of operation, then proceed to Inspection Level 3.
Level 3	Greater than 80 hours	Once a week	If the surface tension readings are less than or equal to 45 dynes/cm, then remain at Inspection Level 3. (2)

**Notes:**

- {1} The time of continuous anodize tank operation is defined as accumulated time when the chromic acid anodize current is flowing.
- {2} If any reading is greater than 45 dynes/cm, then shut down the chromic acid anodize tank operation.
- {3} If the tank operation exceeds 40 hours of operation in one week, the sampling frequency will revert back to the original monitoring requirements until a new tank is required (Table 1).
- {4} Day means only a day during which either the tank is operated or a day during which normal production operations at the facility are conducted, and week means Monday through Friday.
- (2) If the facility exceeds 40 operating hours in a week, the original monitoring requirements from Table 1 of the operation and maintenance plan must be used (These requirements may be implemented instead of the alternative monitoring requirements if the facility may exceed 40 operating hours in a week.):

**Table 1 Original Monitoring Requirements**

Inspection Level	Time of Continuous Anodize Tank Operation at Less Than or Equal to 45 dynes/cm (1)	Frequency of Surface Tension Readings	Actions Required Based on Results of Surface Tension Reading
Level 1	0 to 40 hours	Every 4 operating hours	If the surface tension readings are less than or equal to 45 dynes/cm after 40 hours of operation, then proceed to Inspection Level 2.
Level 2	41 to 80 hours	Every 8 operating hours	If the surface tension readings are less than or equal to 45 dynes/cm after 80 hours of operation, then proceed to Inspection Level 3.
Level 3	Greater than 80 hours	Every 40 operating hours	If the surface tension readings are less than or equal to 45 dynes/cm, then remain at Inspection Level 3. (2)

**Notes:**

- {1} The time of continuous anodize tank operation is defined as accumulated time when the chromic acid anodize current is flowing.  
{2} If any reading is greater than 45 dynes/cm, then shut down the chromic acid anodize tank operation.  
(3) A new tank is defined as any time over 50% of the volume of the tank is removed at one time and the tank remade.

**Reporting:**

- (1) The permittee shall submit a semiannual Ongoing Compliance Status Report.

**EU0170**

Coal Storage Pile

EIG POINT NUMBER	EMISSION UNIT NUMBER	FEDERAL	DESCRIPTION  (for information only, this does not create any permit requirements)
		1) 10 CSR 10-5.120: Information on Sales of Fuels to be Provided and Maintained	
SP-005-01	SP-005-01	X	Coal storage pile

X = Applicable NA = Not Applicable

**COMPLIANCE REQUIREMENTS**

**I) Federally Enforceable Requirements**

**Permit Condition EU0170-001**

10 CSR 10-5.120

**Information on Sales of Fuels to be Provided and Maintained**

**Emission Limitations:**

None

**Record Keeping:**

Coal tickets for coal deliveries must be retained for one (1) year

**Monitoring:**

None

**Reporting:**

None

**EU0180**

**Gasoline Storage Tanks**

EIG POINT NUMBER	EMISSION UNIT NUMBER	FEDERAL						DESCRIPTION (for information only, this does not create any permit requirements)
		1) 40 CFR Part 80.22 (j)	2) 10 CSR 10-5.220: Control of Petroleum Liquid Storage, Loading and Transfer (Tanks greater than 1,000 gallons)	3) 10 CSR 10-5.220: Control of Petroleum Liquid Storage, Loading and Transfer (Tanks greater than 500 gals and less than or equal to 1,000 gals)	4) Operating Permits Obtained Per the Requirements of 10 CSR 10-5.220:	5) Requirements of the Listed Construction Permits Obtained Under 10 CSR 10-6.060	6) 10 CSR 10-5.443: Control of Gasoline Reid Vapor Pressure	
ST-STL-01	ST-022-22	X	X	NA	C2471	#V1072	X	Gasoline UST (8,000 gal)
ST-STL-01	ST-022-25	X	X	NA	C2471	#V1072	X	Gasoline UST (10,000 gal)
ST-STL-01	ST-041-20	X	X	NA	C2474	NA	X	Gasoline UST (8,000 gal)
ST-STL-01	ST-066-02	X	NA	X	NA	NA	X	Gasoline storage tank (~560 gal)
ST-STL-01	ST-102B-01	NA	NA	NA	NA	NA	X	Gasoline storage tank (298 gal)
ST-STL-01	ST-121-01	X	NA	X	NA	NA	X	Gasoline tank (550 gal)
ST-STL-01	ST-220-01	NA	NA	NA	NA	NA	X	Gasoline tank (~300 gal)
ST-STL-01	ST-245-02	NA	NA	NA	NA	NA	X	Gasoline tank (301 gal)

X = Applicable      NA = Not Applicable

## **COMPLIANCE REQUIREMENTS**

### **I) Federally Enforceable Requirements**

#### **Permit Condition EU0180-001**

10 CSR 10-5.220

***Control of Petroleum Liquid Storage, Loading and Transfer (Tanks Greater Than 1,000 Gallons)***

##### **Emission Limitations:**

- (1) All gasoline storage tanks with a capacity greater than 1,000 gallons shall be equipped with a submerged fill pipe unrestricted to within six (6) inches of the bottom of the tank; all storage caps and fittings shall be vapor tight when gasoline transfer is taking place; and each tank shall be vented via conduit that is at least two (2) inches inside diameter, a minimum of twelve (12) foot above grade and equipped with a pressure/vacuum vent cap that is CARB approved.
  - (a) If a deficiency is found in the equipment standards listed in (1), the facility shall be allowed 30 days after discovery to bring the unit into compliance with the standards.
- (2) System shall be equipped with Stage I and Stage II vapor recovery systems which are MoPETP approved systems.

##### **Record Keeping:**

- (1) Delivery records shall be kept at the facility. Retention of delivery records onsite will be limited to the four (4) most recent receipts of each grade of product.
- (2) A copy of self inspections and repairs to correct deficits will be maintained on site.

##### **Monitoring:**

- (1) Stage II shall be inspected on a periodic (monthly) basis.
- (2) Permittee will perform blockage and leakage tests on Stage II systems as directed by local regulatory agency.

##### **Reporting:**

None

#### **Permit Condition EU0180-002**

10 CSR 10-5.220

***Control of Petroleum Liquid Storage, Loading and Transfer (Tanks Greater Than 500 Gallons and Less Than or Equal to 1,000 Gallons)***

##### **Emission Limitations:**

- (1) All gasoline storage tanks with a capacity greater than 500 gallons shall be equipped with a submerged fill pipe unrestricted to within six (6) inches of the bottom of the tank; all storage caps and fittings shall be vapor tight when gasoline transfer is taking place; and each tank shall be vented via conduit that is at least two (2) inches inside diameter, a minimum of twelve (12) foot above grade and equipped with a pressure/vacuum vent cap that is CARB approved.

- (a) If a deficiency is found in the equipment standards listed in (1), the facility shall be allowed 30 days to bring the unit into compliance with the standards.

**Record Keeping:**

Delivery records shall be kept at the facility. Retention of delivery records onsite will be limited to the four (4) most recent receipts of each grade of product.

**Monitoring:**

None

**Reporting:**

None

**Permit Condition EU0180-003**

10 CSR 10-5.220

***Permits Obtained Per the Requirements of 10 CSR 10-5.220***

(1) Operating Permits: C2471, C2474

**Emission Limitations:**

None

**Record Keeping:**

None

**Monitoring:**

None

**Reporting:**

None

**II) State/Local Only Enforceable Requirements**

**Permit Condition EU0180-004**

10 CSR 10-5.443

***Control of Gasoline Reid Vapor Pressure***

**Emission Limitations:**

Selling, dispensing, etc. gasoline with an RVP exceeding 7.0 psi is prohibited between 6/1 and 9/15 of each year, unless the gasoline is a blend with at least 9% to 10% ethyl alcohol by volume, in which case the RVP may not exceed 8.0 psi during the same period. By only buying compliant gasoline from 6/1 through 9/15 each year the tank will be deemed to be in compliance. The use of reformulated gasoline by definition complies with this rule.

**Record Keeping:**

Records shall be kept of the documents accompanying all gasoline shipments to this tank between 6/1 and 9/15. These records will indicate the Reid vapor pressure of the gasoline or that it is reformulated gasoline.

**Monitoring:**

None

**Reporting:**

The permittee shall report to the St. Louis County Health Department Air Pollution Control Section at 111 S. Meramec Ave., Clayton, MO 63105 and the Missouri Department of Natural Resources Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, no later than thirty (30) days after the discovery of any exceedance of the Reid vapor pressure for non-reformulated gasoline required by Emission Limitations.

EU0190  
Fuel Storage Tanks

EIG POINT NUMBER	EMISSION UNIT NUMBER	FEDERAL	DESCRIPTION  (for information only, this does not create any permit requirements)
		1) 40 CFR Part 60, Subpart Kb, 60.116(b) and 10 CSR 10-6-070	
NONE	ST-005-20	X	Fuel oil #2 UST (20,000 gal)
NONE	ST-005-21	X	Fuel oil #2 UST (20,000 gal)
NONE	ST-041-21	X	Jet fuel UST #1 (30,000 gal) A-41
NONE	ST-041-22	X	Jet fuel UST #2 (30,000 gal) B-41
NONE	ST-041-23	X	Jet fuel UST #3 (30,000 gal) C-41
NONE	ST-041-24	X	Jet fuel UST #4 (30,000 gal) D-41
NONE	ST-102-21	X	Fuel oil #2 UST (20,000 gal)
NONE	ST-110-20	X	Fuel oil #2 UST (15,000 gal)
NONE	ST-120-01	NA	Vertical fuel oil #2 (107,000 gal)
NONE	ST-120-02	NA	Vertical fuel oil #2 (50,000 gal)
NONE	ST-111-01	X	Fuel oil #2 underground storage tank (12,000 gal)

X = Applicable      NA = Not Applicable

**COMPLIANCE REQUIREMENTS**

**I) Federally Enforceable Requirements**

**Permit Condition EU0190-001**

10 CSR 10-6.070 and 40 CFR Part 60 Subpart Kb, 60.116(b)

**Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984**

**Emissions Limitations:**

None

**Recordkeeping:**

Records of the tank dimensions and capacity shall be kept for the life of the tank.

**Monitoring:**

None

**Reporting:**

None

**EU0200**

**Vapor Degreasers**

**FEDERAL**

EIG POINT NUMBER	EMISSION UNIT NUMBER	FEDERAL			DESCRIPTION  (for information only, this does not create any permit requirements)
		1) 40 CFR Part 63, Subpart T and 10 CSR 10-6.075: Halogenated Solvent Cleaning NESHAP	2) 10 CSR 10- 5.300: Control of Emissions from Solvent Metal Cleaning	3) Requirements of the Listed Construction Permits Obtained Under 10 CSR 10- 6.060	
VD-027-01	VD-027-01	X	X	#6325	Vapor degreaser (trichloroethylene)
VD-029-01	VD-029-01	X	X	#6258	Vapor degreaser (trichloroethylene)
VD-042-01	VD-042-01	X	X	#5083	Vapor degreaser (Vertrel SMT) PHILLIPS
VD-101-01	VD-101-01	X	X	#1172	Vapor degreaser (trichloroethylene)
VD-101-02	VD-101D-04	X	X	#6168	Vapor degreaser (trichloroethylene)
VD-102-01	VD-102-01	X	X	#1175	Vapor degreaser (trichloroethylene)

X = Applicable

NA = Not Applicable

## **COMPLIANCE REQUIREMENTS**

### **I) Federally Enforceable Requirements**

#### **Permit Condition EU0200-001**

10 CSR 10-6.075 and 40 CFR Part 63, Subpart T

##### **Halogenated Solvent Cleaning NESHAP**

###### **Emission Limitations:**

- (1) Use the three (3)-month rolling average compliance method. Emissions shall not exceed 150 kg per m<sup>2</sup> of solvent/air interface per month, averaged over three (3) consecutive months.
- (2) This rule is not applicable to the listed units when they do not contain a solvent subject to 40 CFR Part 63, Subpart T.

###### **Record Keeping:**

- (1) The following records shall be maintained for five (5) years:
  - (a) Dates and amounts of solvent added to or removed from each unit;
  - (b) Calculations showing the three (3)-month rolling average results.

###### **Monitoring:**

None

###### **Reporting:**

- (1) Initial Statement of Compliance – due within 150 days of NESHAP or startup, whichever is later.
- (2) Annual Solvent Emission Report – due by February 1<sup>st</sup> for the prior year.
- (3) Exceedance Report – due by the 30<sup>th</sup> day following the end of each calendar half or quarter as required by 40 CFR 63.468.

###### **Alternate Compliance Method:**

- (1) Equipment Standard. The equipment standards as stated in 40 CFR Part 63, Subpart T as alternate standards, may be used to show compliance instead of those listed above. If one of the alternate standards is used the monitoring, record keeping and reporting requirements listed in the regulation, for the standard chosen, will be followed.

#### **Permit Condition EU0200-002**

10 CSR 10-5.300

##### **Control of Emissions from Solvent Metal Cleaning**

###### **Emission Limitations:**

- (1) Operational restrictions as listed in 10 CSR 10-5.300.
- (2) Training
  - (a) Only persons who have received training on the operational and equipment requirements specified in this rule are allowed to operate the equipment.
  - (b) The supervisor of any person who operates the equipment must have equal or better training.
  - (c) Refresher training shall be given to all operators every 12 months.

- (3) This rule is not applicable to the listed units when they only contain 1,1,1-trichloroethane, trichlorotrifluoroethane, and/or any other exempt VOC.

**Record Keeping:**

- (1) Monthly inventory records of vapor degreaser consumption and amount purchased. These records shall include maintenance and repair logs for both the degreaser and any associated control equipment.
- (2) A record of solvent metal cleaning training shall be kept for each employee who has been trained. These records shall be maintained for two (2) years.

**Monitoring:**

None

**Reporting:**

The permittee shall report to the St. Louis County Health Department Air Pollution Control Section at 111 S. Meramec Ave., Clayton, MO 63105 and the Missouri Department of Natural Resources Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, no later than thirty (30) days after the discovery of any exceedance of solvent vapor pressure allowed in 10 CSR 10-5.300

**Permit Condition EU0200-003**

10 CSR 10-6.060

**Air Construction Permits**

- (1) **Requirements of the Construction Permit Numbers: #'s 6325, 1137, 1172, 6168, 1175**

**Emission Limitations:**

None

**Record Keeping:**

None

**Monitoring:**

None

**Reporting:**

None

- (2) **Requirements of the Construction Permit Number: #6258**

**Emission Limitations:**

Trichloroethylene usage is limited to two thousand five hundred sixty-three (2563) gallons per year on a twelve (12) month rolling average.

**Record Keeping:**

- (1) The permittee shall maintain monthly usage records on site, for the latest twenty-four (24) month period, which clearly demonstrates compliance with the limit established in the emission limitation above.
- (2) The permittee shall maintain records that show the twelve (12) month rolling average of trichloroethylene usage.

**Monitoring:**

None

**Reporting:**

Should the records indicate that a violation of the emission limitation above has occurred, the permittee shall notify the St. Louis County Health Department Air Pollution Control Section at 111 S. Meramec Ave., Clayton, MO 63105 and the Missouri Department of Natural Resources Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, by no later than the next working day. This notification is not required to be certified by a responsible official.

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## IV. Core Permit Requirements

The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements.

### COMPLIANCE REQUIREMENTS

#### I) Federally Enforceable Requirements

##### 1) 10 CSR 10-6.050: Start-Up, Shutdown and Malfunction Conditions

###### a) Emission Limitations:

(1) None

###### b) Record Keeping Requirements:

(1) None

###### c) Monitoring Requirements:

(1) None

###### d) Reporting Requirements:

(1) At the time of each occurrence

(a) The permittee shall submit the following information to the director not later than 15 days after receipt of the notice of excess emissions from the agency.

1. Name and location of installation.
2. Name and telephone number of person responsible for the installation.
3. The identity of the equipment causing the excess emissions.
4. The time and duration of the period of excess emissions.
5. The cause of the excess emissions.
6. The type of air contaminant involved.
7. A best estimate of the magnitude of the excess emissions expressed in the units of the applicable emission control regulation and the operating data and calculations used in estimating the magnitude.
8. The measures taken to mitigate the extent and duration of the excess emissions.
9. The measures taken to remedy the situation which caused the excess emissions and the measures taken or planned to prevent the recurrence of these situations.

##### 2) 10 CSR 10-6.060: Construction Permits Required

###### a) Emission Limitations:

- (1) The permittee shall not commence construction, modification, or major modification of any installation subject to this rule, begin operation after that construction, modification, or major modification, or begin operation of any installation which has been shut down longer than five (5) years without first obtaining a permit from the permitting authority under this rule, unless a waiver is first obtained from the permitting authority.
- (2) Construction that meets one of the requirements below are exempt from permitting.
  - (a) Criteria Pollutants

1. For construction or modification of units that will cause emissions from a location less than 500 feet from the property boundary, emissions of each criteria pollutant are less than 0.5 pounds per hour at maximum design rate.
2. For construction or modification of units that will cause emissions from a location more than 500 feet from the property boundary, emissions of each criteria pollutant are less than 0.91 pounds per hour at maximum design rate.
3. Actual emissions of each criteria pollutant will be no more than 876 pounds per year.

(b) Hazardous Air Pollutants

1. At maximum design capacity the construction or modification will result in emissions of a hazardous air pollutant at a rate of no more than 0.5 pounds per hour, or the hazardous air pollutant emission threshold as established in subsection (12)(J) of this rule.

(c) Other exemptions may also apply.

b) Record Keeping Requirements:

- (1) None

c) Monitoring Requirements:

- (1) None

d) Reporting Requirements:

- (1) None

**3) 40 CFR Part 70 and 10 CSR 10-6.065: Operating Permits Required**

a) Emission Limitations:

- (1) The permittee shall obtain an operating permit for the facility, so long as it has a potential to emit greater than the de minimis levels. The term of the operating permit is five years. It shall file for renewal of this operating permit no sooner than 18 months, nor later than six months, prior to the expiration date of this operating permit.

b) Record Keeping Requirements:

- (1) Every 5 years

- (a) The permittee shall retain the most current operating permit issued to this facility on-site and shall immediately make such permit available to any agency personnel upon request.

c) Monitoring Requirements:

- (1) None

d) Reporting Requirements:

- (1) Semi-Annual Monitoring Report.
- (2) Annual Compliance Certification.

**4) 10 CSR 10-6.110: Submission of Emission Data, Emission Fees and Process Information**

a) Emission Limitations:

- (1) Annually

- (a) The permittee shall pay \$25.70 per ton of pollutant for certain pollutants or the amount established by the Missouri Air Conservation Commission under Missouri Air Law 643.079(1) if changed.

b) Record Keeping Requirements:

(1) Annual

(a) The permittee shall complete and submit an EIQ in accordance with the requirements outlined in this rule.

c) Monitoring Requirements:

(1) None

d) Reporting Requirements:

(1) Annual

(a) Submit EIQ by April 1 for the previous year.

**5) 10 CSR 10-6.130: Controlling Emissions During Episodes of High Air Pollution Potential**

a) Emission Limitations:

(1) As required

(a) This rule specifies the conditions that establish an air pollution alert (yellow/red), watch or emergency and the associated procedures and emissions reduction objectives for dealing with each.

b) Record Keeping Requirements:

(1) None

c) Monitoring Requirements:

(1) None

d) Reporting Requirements:

(1) As required

(a) The permittee shall submit an appropriate emergency plan as required by the director.

**6) 10 CSR 10-6.150: Circumvention**

a) Emission Limitations:

(1) The permittee shall not cause or permit the installation or use of any device or any means which, without resulting in reduction in the total amount of air contaminant emitted, conceal or dilute an emission of air contaminant which violates a rule of the Missouri Air Conservation Commission.

b) Record Keeping Requirements:

(1) None

c) Monitoring Requirements:

(a) None

d) Reporting Requirements:

(a) None

**7) 10 CSR 10-6.180: Measurement of Emissions of Air Contaminants**

a) Emission Limitations:

(1) None

b) Record Keeping Requirements:

(1) None

c) Monitoring Requirements:

(1) As required

- (a) The director may require any person responsible for the source of emission of air contaminants to make or have made test to determine the quantity or nature, or both, of emission of air contaminants from the source.
  - 1. The director may specify testing methods to be used in accordance with good professional practice.
  - 2. The director may observe the testing.
  - 3. All tests shall be conducted by reputable qualified personnel.
- (b) The director may conduct tests of emissions of air contaminants from any source.
  - 1. Upon request from the director, the person responsible for the source to be tested shall provide necessary ports in stacks or ducts and other safe and proper sampling and testing facilities, exclusive of instruments and sensing devices as may be necessary for proper determination of the emission of air contaminants.
- d) Reporting Requirements:
  - (1) As required
    - (a) The director shall be given a copy of the test results in writing and signed by the person responsible for the tests.

**8) 10 CSR 10-5.070: Open Burning Restrictions**

- a) Emission Limitations:
  - (1) The permittee shall not conduct, cause, permit or allow a salvage operation, the disposal of trade wastes or burning of refuse by open burning. Exception - Open burning of vegetation may be permitted only when it can be shown that open burning is the only feasible method of disposal or an emergency exists which requires open burning. Open burning of vegetation is limited to the period beginning September 16 and ending April 14 of each calendar year.
- b) Record Keeping Requirements:
  - (1) Maintain files with letters from the director approving the open burning operation.
- c) Monitoring Requirements:
  - (1) None
- d) Reporting Requirements:
  - (1) At the time of each occurrence
    - (a) Any person intending to engage in open burning shall file a request to do so with the director. The request shall include the following:
      - 1. The name, address and telephone number of the person submitting the application;
      - 2. The type of business or activity involved;
      - 3. A description of the proposed equipment and operating practices, including the type, quantity and composition of vegetation to be burned;
      - 4. The schedule of burning operations;
      - 5. The exact location where open burning will be used to dispose of the vegetation;
      - 6. Reasons why no method other than open burning is feasible; and
      - 7. Evidence that the proposed open burning has been approved by the fire control authority which has jurisdiction.

- (b) Upon approval of the application by the director, the person may proceed with the operation under the terms of the open burning permit. Be aware that such approval shall not exempt the permittee from the provisions of any other law, ordinance, or regulation.

**II) State/Local Only Enforceable Requirements**

**1) 10 CSR 10-6.100: Alternate Emission Limits**

a) Emission Limitations:

- (1) Proposals for alternate emission limitations shall be submitted on Alternate Emission Limits Permit forms provided by the department. An installation owner or operator must obtain an Alternate Emission Limits Permit in accordance with 10 CSR 10-6.100 before alternate emission limits may become effective.

b) Record Keeping Requirements:

- (1) None

c) Monitoring Requirements:

- (1) None

d) Reporting Requirements:

- (1) None

**2) 10 CSR 10-5.160: Control of Odors in the Ambient Air**

a) Emission Limitations:

- (1) No person shall emit odorous matter as to cause an objectionable odor on or adjacent to:

(a) Residential, recreational, institutional, retail sales, hotel or educational premises.

(b) Industrial premises when air containing odorous matter is diluted with 20 or more volumes of odor-free air; or

(c) Premises other than those above when air containing odorous matter is diluted with four (4) or more volumes of odor-free air.

- (2) The previously mentioned requirement shall apply only to objectionable odors.

(a) An odor will be deemed objectionable when 30% or more of a sample of the people exposed to it believe it to be objectionable in usual places of occupancy; the sample size to be at least 20 people or 75% of those if fewer than 20 people are exposed.

b) Record Keeping Requirements:

- (1) None

c) Monitoring Requirements:

- (1) None

d) Reporting Requirements:

- (1) None

### III) ST. LOUIS COUNTY APPLICABLE REQUIREMENTS

The following rules are locally enforceable only:

#### 1) The St. Louis County Air Pollution Control Code, Section 612.040, Air Quality Standards and Air Pollution Control Regulations

a) Emission Standards:

- (1) Saint Louis County Air Pollution Control may enforce Missouri Code of State Regulations as adopted and promulgate by the Air Conservation Commission of the State of Missouri consisting of Title 10, Division 10, Chapter 5 and 6.

b) Record Keeping Requirements:

- (1) None

c) Monitoring Requirements:

- (1) None

d) Reporting Requirements:

- (1) None

#### 2) The St. Louis County Air Pollution Control Code, Section 612.100, Emergency Abatement of Violation

a) Emission Standards:

- (1) By written approval of the County Executive, any facility indirectly or directly discharge any air contaminant in violation of The St. Louis County Air Pollution Control Code where it is the opinion of the Director that the discharge creates an emergency which requires immediate action to protect the public health, shall order the person in writing to discontinue immediately.

b) Record Keeping Requirements:

- (1) None

c) Monitoring Requirements:

- (1) None

d) Reporting Requirements:

- (1) None

#### 3) The St. Louis County Air Pollution Control Code, Section 612.110, Permits Required

a) Emission Standards:

- (1) The Permittee shall obtain St. Louis County Department of Health (DOH) operating permits for its installation. The Permittee shall not commence construction, modification, or major modification of any installation subject to this rule without obtaining a permit from St. Louis County DOH.

b) Record Keeping Requirements:

- (1) None

c) Monitoring Requirements:

- (1) None

d) Reporting Requirements:

(1) None

**4) The St. Louis County Air Pollution Control Code, Section 612.120, Permits to be Visibly Affixed or Placed**

a) Emission Standards:

(1) The Permittee shall Visibly affix St. Louis County DOH Permit on or near permitted equipment.

b) Record Keeping Requirements:

(1) None

c) Monitoring Requirements:

(1) Visual inspection performed during periodic St. Louis County inspections.

d) Reporting Requirements:

(1) None

**5) The St. Louis County Air Pollution Control Code, Section 612.200, Testing Prior to Granting of Operating Permit**

a) Emission Standards:

(1) Before an authority to construct or permit to operate is granted, the Director may require the applicant to conduct tests to determine the kind or amount of the air contaminant emitted from the equipment. Such tests shall be conducted, reviewed and certified by a licensed engineer. The permittee shall notify the County of the time and place of testing for the purpose of witnessing the test.

b) Record Keeping Requirements:

(1) Records shall be kept during testing as approved in a test protocol submitted to the County prior to testing.

c) Monitoring Requirements:

(1) Monitoring during testing shall be as approved in a test protocol submitted to the County prior to testing.

d) Reporting Requirements:

(1) Submittal of test results as reviewed and certified by a licensed engineer.

**6) The St. Louis County Air Pollution Control Code, Section 612.220, Suspension or Revocation of Permits**

a) Emission Standards:

(1) The Director may suspend or revoke a permit to operate or authority to construct for willful or continued violation of The St. Louis County Air Pollution Control Code

b) Record Keeping Requirements:

(1) None

c) Monitoring Requirements:

(1) None

d) Reporting Requirements:

(1) None

**7) The St. Louis County Air Pollution Control Code, Section 612.260, Schedules**

a) Emission Standards:

(1) The Permittee shall pay St. Louis County DOH Construction Permit fees when applicable and annual Operating Permit fees in accordance with the rule.

b) Record Keeping Requirements:

(1) None

c) Monitoring Requirements:

(1) None

d) Reporting Requirements:

(1) None

**8) The St. Louis County Air Pollution Control Code, Section 612.280, Testing by Order of the Board**

a) Emission Standards:

(1) If any article, machine, equipment or other contrivance is in violation of The St. Louis County Air Pollution Control Code, the Director may file with the Board for its approval an order directing the permittee of such equipment to conduct such tests as are necessary in the opinion of the Director and approved by the Board to determine whether the equipment is in violation of this Code.

b) Record Keeping Requirements:

(1) None

c) Monitoring Requirements:

(1) The entire test results shall be reviewed and certified by an engineer licensed under Chapter 327, R.S.Mo.1959. The engineer shall be selected by the permittee and approved by the Board.

d) Reporting Requirements:

The permittee shall give at least seven (7) days notice prior to the commencement of the test. The permittee shall report to the Air Pollution Control Section of the SLCDOH, 111 South Meramec, Clayton, Mo. 63105 and the Air Pollution Control Program at P.O. Box 176, Jefferson City, Mo. 65102.

**9) The St. Louis County Air Pollution Control Code, Section 612.290, Right of Entry; Inspections; Samples**

a) Emission Standards:

(1) The Permittee shall allow the Director or His agent to enter at all times with reasonable notice, inspect any equipment, control apparatus, fuel, matter or things which affect or may affect the emission of air contaminants, inspect any records relating to the use of any equipment or control apparatus which affect or may affect the emission of air contaminants, and sample any equipment, control apparatus, fuel, matter or things which affect or may affect the emission of air contaminants.

b) Record Keeping Requirements:

(1) None

c) Monitoring Requirements:

(1) None

d) Reporting Requirements:

(1) None

**10) The St. Louis County Air Pollution Control Code, Section 612.310, Upset Conditions, Breakdown or Scheduled Maintenance**

a) Emission Standards:

(1) None

b) Record Keeping Requirements:

(1) None

c) Monitoring Requirements:

(1) None

d) Reporting Requirements:

(1) The permittee shall report to the Air Pollution Control Section of the SLCDOH, 111 South Meramec, Clayton, Mo. 63105 and the Air Pollution Control Program at P.O. Box 176, Jefferson City, Mo. 65102 and the Air Pollution Control Program at P.O. Box 176, Jefferson City, Mo. 65102 within 24 hours of occurrence of any unavoidable upset in or breakdown of equipment that results in violation of St. Louis County Air Pollution Control requirements and in case of shutdown for necessary scheduled maintenance that may result in violation of St. Louis County Air Pollution Control requirements, the intent to be shutdown shall be reported to Air Pollution Control Section 24 hours prior to shutdown.

**11) The St. Louis County Air Pollution Control Code, Section 612.340, Air Pollution Nuisances Prohibited**

a) Emission Standards:

(1) It is unlawful for the Permittee to cause of such quantities of soot, cinders, noxious acids, fumes and gases or other particulate matter from whatever source in such place or matter as to be detrimental to any person or the public or to endanger the health, comfort and safety of any person or the public, injury or damage to property or business.

b) Record Keeping Requirements:

(1) None

c) Monitoring Requirements:

(1) None

d) Reporting Requirements:

(1) None

**12) The St. Louis County Air Pollution Control Code, Section 612.380, Interfering with or Obstructing Division Personnel**

a) Emission Standards:

(1) No Person shall hinder, resist, interfere with or obstruct the Director or any Division employee in carrying out any duty for the Director or the Board.

b) Record Keeping Requirements:

(1) None

c) Monitoring Requirements:

(1) None

d) Reporting Requirements:

(1) None

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## **V. General Permit Requirements**

### **I. General Monitoring, Record keeping, and Reporting Requirements -- 10 CSR 10-6.065(6)(C)1.C**

#### **A. General Monitoring Requirements**

- 1) None

#### **B. General Record Keeping Requirements**

- 1) All required monitoring data and support information shall be retained for a period of at least five (5) years from the date of the monitoring sample, measurement, report or application.
- 2) Copies of all current operating and construction permits issued to this facility shall be kept on-site for as long as the permits are in effect. Copies of these permits shall be made immediately available to any St. Louis County Department of Health and Missouri Department of Natural Resources' (DNR) personnel upon request.

#### **C. General Reporting Requirements**

- 1) Semiannual Monitoring Reports
  - a) The permittee shall submit a semiannual report of all required monitoring by:
    - i) October 1st for monitoring which covers the January through June time period, and
    - ii) April 1st for monitoring which covers the July through December time period.
  - b) Each semiannual monitoring report must identify any deviations from permit requirements since the previous report, that have been monitored by the monitoring systems required under the permit, and any deviations from the monitoring, record keeping and reporting requirements of the permit.
  - c) These reports shall be submitted to St. Louis County Department, Air Pollution Control, 111 S. Meramec Ave., Clayton, Mo. 63105 and the Air Pollution Control Program at P.O. Box 176, Jefferson City, Mo. 65102.
- 2) Annual Compliance Certification
  - a) The annual compliance certification shall be submitted to St. Louis County, department of Health, Air Pollution Control and to the Administrator, EPA Region 7 Missouri Air Compliance Coordinator.
- 3) Supplemental reports.
  - a) In addition to semiannual monitoring reports, the permittee is required to submit supplemental reports as specified below. All reports of deviations shall identify the cause or probable cause of the deviations and any corrective actions or preventative measures taken.
    - i) Notice of any deviation resulting from an emergency (or upset) condition as defined in paragraph (6)(C)7 of 10 CSR 10-6.065 (Emergency Provisions) shall be submitted either verbally or in writing within two (2) working days after the date on which the emission limitation is exceeded due to the emergency, if you wish to assert an affirmative defense. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that indicate an emergency occurred and that you can identify the cause(s) of the emergency. The permitted facility must show that it was operated properly at the time and that during the period of the emergency the

- permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or requirements in the permit based on its operating and maintenance plan. The notice must contain a description of the emergency, the steps taken to mitigate emissions, and the corrective actions taken.
- ii) Any deviation that poses an imminent and substantial danger to public health, safety or the environment shall be reported as soon as practicable or on the schedule specified in this permit.
  - iii) Any other deviations identified in the permit as requiring more frequent reporting than the permittee's semiannual report shall be reported on the schedule specified in the permit.
- b) These supplemental reports shall be submitted to St. Louis County, Department of Health, Air Pollution Control, 111 S. Meramec Ave., Clayton, Mo. 63105 and the Air Pollution Control Program at P.O. Box 176, Jefferson City, Mo. 65102
- 4) Every report submitted shall be certified by a responsible official, except that, if a report of a deviation must be submitted within thirty (30) days or next working day after the deviation, the report may be submitted without a certification if the report is resubmitted with an appropriate certification within ten (10) days after that, together with any corrected or supplemental information required concerning the deviation.
- 5) The permittee may request confidential treatment of information submitted in any report in accordance with 10 CSR 10-6.210.

## **II. Standard Terms And Conditions**

### **D. General Requirements -- 10 CSR 10-6.065(6)(C)1.G.**

- 1) Duty to comply -- 10-6.065(6)(C)1.G.(I) McDonnell Douglas Corporation (the permittee) must comply with all of the terms and conditions of this permit. Any noncompliance with a permit condition constitutes a violation and is grounds for enforcement action, for permit termination, permit revocation and re-issuance, permit modification or denial of a permit renewal application.
- 2) Prohibited Defenses The permittee may not use as a defense in an enforcement action that it would have been necessary for the permittee to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit.
- 3) Permit Actions The permit may be modified, revoked, reopened, reissued or terminated for cause. Except as provided for minor permit modifications, the filing of an application or request for a permit modification, revocation and re-issuance, or termination, or the filing of a notification of planned changes or anticipated noncompliance, will not stay any permit condition
- 4) Property Rights This permit does not convey any property rights of any sort, nor grant any exclusive privilege.
- 5) Duty to provide information The permittee shall furnish to the director, upon receipt of a written request and within a reasonable time, any information that the director reasonably may require to determine whether cause exists for modifying, reopening, reissuing or revoking the permit or to determine compliance with the permit. Upon request, the permittee also shall furnish to the director copies of

records required to be kept by the permittee. The permittee may make a claim of confidentiality for any information or records submitted under this requirement.

**E. Permit Duration - 10 CSR 10-6.065(6)(C)1.B, 10-6.065(6)(E)3.**

This permit is issued for a term of five (5) years. The permit term shall commence on the date of issuance of this permit. This permit shall expire at the end of this five (5) year time period, unless renewed or unless a complete permit renewal application is submitted at least six (6) months before the date of expiration. If a timely and complete application for a permit renewal is submitted, but the permitting authority fails to take final action to issue or deny the renewal permit before the expiration date of this permit, this permit shall not expire until the renewal permit is issued or denied. Any permit shield granted under this permit shall continue in effect during this period of time.

**F. Severability Clause - 10 CSR 10-6.065(6)(C)1.**

In the event of a successful challenge to any part of this permit, all uncontested permit conditions shall continue to be in force.

**G. Incentive Programs Not Requiring Permit Revisions - 10 CSR 10-6.065(6)(C)1.H.**

No permit revision will be required for any installation changes made under any approved economic incentive, marketable permit, emissions trading, or other similar programs or processes provided for in this permit.

**H. Certification Requirements--10 CSR 10-6.065(6)(C)3.A.**

Unless otherwise specified in this permit, or by approval of the Director, any document (including reports) required to be submitted under this permit shall contain a certification signed by a responsible official that to the best of his/her knowledge the results of the required monitoring are true and accurate.

**I. Inspection and Entry - 10 CSR 10-6.6065(6)(c)3.B.**

Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized officials of the St. Louis County, Department of Health, Air Pollution Control, or their authorized agents, to perform the following (subject to your right to seek confidential treatment of information submitted to, or obtained by, the APCR).

- a) Enter upon your premises where a permitted installation is located or an emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
- b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit,
- c) Inspect, at reasonable times and using reasonable safety practices, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit, and
- d) As authorized by the Missouri Air Conservation Law, Chapter 643, RSMo or the Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the terms of this permit, and all applicable requirements as outlined in this permit.

**J. Progress Reports -- 10 CSR 10-6.6065(6)(c)3.D.**

All progress reports required under an applicable schedule of compliance shall be submitted semiannually (or more frequently if specified in the applicable requirement). These progress reports shall contain the following:

- a) Dates for achieving the activities, milestones or compliance required in the schedule of compliance, and dates when these activities, milestones or compliance were achieved, and
- b) An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventative or corrective measures adopted.

**K. Compliance Certification -- 10 CSR 10-6.6065(6)(c)3.E.**

- a) The permittee shall submit a certification that it is in compliance with all of the federally enforceable terms and conditions contained in this permit, including emissions limitations, standards, or work practices.
- b) These certifications shall be submitted annually (unless the applicable requirement specifies submission more frequently),
- c) The compliance certification shall include the following:
  - i) The identification of each term or condition of the permit that is the basis of the certification,
  - ii) Your current compliance status, as shown by monitoring data and other information reasonably available to you,
  - iii) Whether compliance was continuous or intermittent,
  - iv) The method(s) used for determining the compliance status of the installation, both currently and over the reporting period, and
  - v) Such other facts as the APCP will require in order to determine the compliance status of this facility.

**L. Risk Management Plans Under Section 112(r) 10 CSR 10-6.065(6)(C)1.D.**

The permittee shall comply with the requirements of 40 CFR Part 68, Accidental Release Prevention Requirements. If the permittee has more than a threshold quantity of a regulated substance in process, as determined by 40 CFR Section 68.115, the permittee shall submit a Risk Management Plan in accordance with 40 CFR Part 68 no later than the latest of the following dates:

- a) June 21, 1999
- b) Three (3) years after the date on which a regulated substance is first listed under 40 CFR Section 68.130; or
- c) The date on which a regulated substance is first present above a threshold quantity in a process

**M. Federal Enforceability -- 10 CSR 10-6.065(6)(C)2.**

All terms and conditions of this permit are federally enforceable, except for those terms and conditions designated in the permit as not federally enforceable (State/Local).

**N. Responsible Official -- 10 CSR-6.020(2)(r)12.**

The application utilized in the preparation of this was signed by John J. Van Gels, Vice President General Manager Production Operation and General Services. If this person terminates employment, or is reassigned different duties such that a different person becomes the responsible person to represent and bind the installation in environmental permitting affairs, the owner or operator of this air contaminant source shall notify the Director of the Air Pollution Control Program of the change. Said notification shall be in writing and shall be submitted within thirty days of the change. The notification shall include the name and title of the new person assigned by the source owner or operator to represent and bind the installation in environmental permitting affairs. All representations, agreement to terms and conditions and covenants made by the former responsible person that were used in

the establishment of limiting permit conditions on this permit will continue to be binding on the installation until such time that a revision to this permit is obtained that would change said representations, agreements and covenants. Gerard J. Olsen Director of General Services and Michael J. Dwyer Director of Safety, Health and Environmental Affairs may serve as alternate Responsible Officials should Mr. Van Gels be unavailable.

**O. Statement Of Basis - 10 CSR 0-6.065(6)(E)1.C.**

This permit is accompanied by a statement setting forth the legal and factual basis for the draft permit conditions (including references to applicable statutory or regulatory provisions). This Statement of Basis, while referenced by the permit, is not an actual part of the permit.

**III. PERMIT SHIELD-10 CSR 10-6.065(6)(C)6 (FEDERALLY AND STATE ENFORCEABLE).**

**A.** Compliance with the terms and conditions of this permit shall be deemed compliance with all applicable requirements as of the date that this permit is issued, provided that:

- 1) The applicable requirements are included and specifically identified in this permit; or
- 2) The permitting authority, in acting on the permit revision or permit application, determines in writing that other requirements, as specifically identified in the permit or Statement of Basis, are not applicable to the installation, and this permit or the Statement of Basis expressly includes that determination or a concise summary of it.

**B.** The permit shield does not affect the following:

- 1) The provisions of section 303 of the Act or section 643.090, RSMo concerning emergency orders,
- 2) Liability for any violation of an applicable requirement which occurred prior to, or was existing at, the time of permit issuance,
- 3) The applicable requirements of the acid rain program,
- 4) The administrator's authority to obtain information,
- 5) The provisions of 40 CFR Part 82, or
- 6) Any other permit or extra-permit provisions, terms or conditions expressly excluded from the permit shield provisions.

**III. Emergency Provisions - 10 CSR 10-6.065(6)(C)7.**

**A.** An emergency or upset shall constitute an affirmative defense to an enforcement action brought for noncompliance with technology-based emissions limitations. To establish an emergency- or upset-based defense, you must demonstrate, through properly signed, contemporaneous operating logs or other relevant evidence, the following:

- 1) That an emergency or upset occurred and that you can identify the source of the emergency or upset,
- 2) That the installation was being operated properly,
- 3) That you took all reasonable steps to minimize emissions that exceeded technology-based emissions limitations or requirements in this permit.
- 4) That you submitted notice of the emergency to the APCP within two (2) working days of the time when emission limitations were exceeded due to the emergency.

This notice must contain a description of the emergency, any steps taken to mitigate emissions, and any corrective actions taken.

- B. An emergency or upset shall not include noncompliance caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

#### IV. Definitions

- A. Chemical Milling Maskant: a coating that is applied directly to aluminum components to protect surface areas when chemical milling the component with a Type I or Type II etchant. Type I chemical milling maskants are used with a Type I etchant and Type II chemical milling maskants are used with a Type II etchant. This definition does not include bonding maskants, critical use and line sealer maskants, and seal coat maskants. Additionally, maskants that must be used with a combination of Type I or II etchants and any of the above types of maskants (i.e., bonding, critical use and line sealer, and seal coat) are also exempt from this subpart. (Words in this definition have the same meaning as in the Aerospace NESHAP 40 CFR Part 63, Subpart GG.)
- B. Day: A 24 hour period, midnight to midnight, not including weekends or official facility holidays.
- C. Director: the Director of the Department of Natural Resources Air Program or his designee.
- D. St. Louis County Air Pollution Control Program Manager: Air Pollution Control Program Manager or his designee.

#### V. Permit Actions

- A. Operational Flexibility - 10 CSR 10-6.065(6)(C)8 (Federally and State enforceable). The permitted installation is not required to apply for or obtain a permit revision in order to make any of the changes to the permitted installation described below if the changes are not Title I modifications, the changes do not cause emissions to exceed emissions allowable under the permit, and the changes do not result in the emission of any air contaminant not previously emitted. The permittee shall notify this agency and the administrator at least seven (7) days in advance of these changes, except as allowed for emergency or upset conditions. Emissions allowable under the permit means a federally-enforceable permit term or condition determined at issuance to be required by an applicable requirement that established an emissions limit (including a work practice standard) or a federally enforceable emissions cap that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject.
  - 1) Section 502(b)(10) changes. Changes that, under section 502(b)(10) of the Act, contravene an express permit term may be made without a permit revision, except for changes that would violate applicable requirements of the Act or contravene federally enforceable monitoring (including test methods), record keeping, reporting or compliance requirements of the permit.
    - a) Before making a change under this provision, the permittee shall provide advance written notice to this agency and to the administrator, describing the changes to be made, the date on which the change will occur, and any changes in emission and any permit terms and conditions that are affected. The permittee shall maintain a copy of the notice with the permit, and this agency shall place a copy with the permit in the public file. Written notice shall be provided to the administrator and this agency at least seven (7) days before the

change is to be made. If less than seven (7) days notice is provided because of a need to respond more quickly to these unanticipated conditions, the permittee shall provide notice to the administrator and the permitting authority as soon as possible after learning of the need to make the change.

b) The permit shield shall not apply to these changes.

2) SIP-based emissions trading changes. Does not apply.

3) Emissions cap-based changes. Does not apply.

4) Off-Permit Changes - 10 CSR 10-6.065(6)(C)9 (Federally and State enforceable).

a) Except as noted below, the permittee may make any change in its permitted operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision.

b) Insignificant activities listed in the application, but not otherwise addressed in or prohibited by this permit, shall not be considered to be constrained by this permit for purposes of the off-permit provisions of this section.

c) Off-permit changes shall be subject to the following requirements and restrictions:

i) Compliance with applicable requirements. The change must meet all applicable requirements of the Act and may not violate any existing permit term or condition; the permittee may not change a permitted installation without a permit revision, even if the change is not addressed in or constrained by the permit, if this change is subject to any requirements under Title IV of the Act or is a Title I modification;

ii) Contemporaneous notice, except insignificant activities. The permittee must provide written notice of the change to the permitting authority and to the administrator no later than the next annual emissions report. This notice shall not be required for changes that are insignificant activities under paragraph (6)(B)3. of this rule. This written notice shall describe each change, including the date, any change in emissions, pollutants emitted and any applicable requirement that would apply as a result of the change.

iii) Record of changes. The permittee shall keep a record describing all changes made at the installation that result in emissions of a regulated air pollutant subject to an applicable requirement and the emissions resulting from these changes; and

d) The permit shield shall not apply to these changes.

## APPENDIX 1

**Table I: Specialty Coating VOC Limitations.**

	Pounds per Gallon	Grams per Liter
Ablative Coating	5.0	600
Adhesion Promoter	7.4	890
Adhesive Bonding Primers:		
Cured at 250°F or below	7.1	850
Cured above 250°F	8.6	1030
Adhesives:		
Commercial Interior Adhesive	6.3	760
Cyanoacrylate Adhesive	8.5	1020
Fuel Tank Adhesive	5.2	620
Nonstructural Adhesive	3.0	360
Rocket Motor Bonding Adhesive	7.4	890
Rubber-Based Adhesive	7.1	850
Structural Autoclavable Adhesive	0.5	60
Structural Nonautoclaveable Adhesive	2.1	850
Antichafe Coating	5.3	660
Bearing Coating	5.2	620
Caulking and Smoothing Compounds	7.1	850
Chemical Agent-Resistant Coating	4.6	550
Clear Coating	6.0	720
Commercial Exterior Aerodynamic Structure Primer	5.4	650
Compatible Substrate Primer	6.5	780
Corrosion Prevention Compound	5.9	710
Cryogenic Flexible Primer	5.4	645
Cryoprotective Coating	5.0	600
Dry Lubricative Material	7.3	880
Electric or Radiation-Effect Coating	6.7	800
Electrostatic Discharge and Electromagnetic Interference (EMI) Coating	6.7	800
Elevated Temperature Skydrol Resistant Commercial Primer	6.2	740
Epoxy Polyamide Topcoat	5.5	660
Fire-Resistant (interior) Coating	6.7	800
Flexible Primer	5.3	640
Flight Test Coatings:		
Missile or Single Use Aircraft	3.5	420
All Others	7.0	840
Fuel-Tank Coating	6.0	720
High-Temperature Coating	7.1	850
Insulation Covering	6.2	740
Intermediate Release Coating	6.3	750
Lacquer	6.9	830
Maskant:		
Bonding Maskant	10.3	1230
Critical Use and Line Sealer Maskant	8.5	1020
Seal Coat Maskant	10.3	1230
Metallized Epoxy Coating	6.2	740

	<b>Pounds per Gallon</b>	<b>Grams per Liter</b>
Mold Release	6.5	780
Optical Anti-Reflective Coating	6.3	750
Part Marking Coating	7.1	850
Pretreatment Coating	6.5	780
Rain Erosion-Resistant Coating	7.1	850
Rocket Motor Nozzle Coating	5.5	660
Scale Inhibitor	7.3	880
Screen Print Ink	7.0	840
Sealants:		
Extrudable/Rollable/Brushable Sealant	2.3	280
Sprayable Sealant	5.0	600
Silicone Insulation Material	7.1	850
Solid Film Lubricant	7.3	880
Specialized Function Coating	7.4	890
Temporary Protective Coating	2.7	320
Thermal Control Coating	6.7	800
Wet Fastener Installation Coating	5.6	675
Wing Coating	7.1	850

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## STATEMENT OF BASIS

### **Permit Reference Documents**

These documents were relied upon in the preparation of the operating permit. Because they are not incorporated by reference, they are not an official part of the operating permit.

- 1) Part 70 Operating Permit Application, received May 5, 1997;
- 2) 1998 Emissions Inventory Questionnaire;
- 3) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition.

### **Applicable Requirements Included in the Operating Permit but Not in the Application**

In the operating permit application, the installation indicated they were not subject to the following regulation(s). However, in the review of the application, the agency has determined that the installation is subject to the following regulation(s) for the reasons stated.

10 CSR 10-5.040, "Use of Fuel in Hand-Fired Equipment Prohibited", all facilities in the non-attainment area are subject to this rule.

10 CSR 10-5.295, "Control of Emissions From Aerospace Manufacture and Rework Facilities", the rule went into effect Feb. 29, 2000.

10 CSR 10-5.510, "Control of Emissions of Nitrogen Oxides" the rule went into effect Feb. 29, 2000 and the actual compliance date is May 1, 2002.

10 CSR 10-6.220, "Restriction of Emission of Visible Air Contaminants" the rule into effect November 30, 1999.

### **Other Air Regulations Determined Not to Apply to the Operating Permit**

The Air Pollution Control Program (APCP) has determined the following requirements to not be applicable to this installation at this time for the reasons stated.

10 CSR 10-5.110, "Restrictions of Emissions of Sulfur Dioxide for Use of Fuel", the rule was rescinded July 30, 1997.

10 CSR 10-5.150, "Emission of Certain Sulfur Compounds Restricted", the rule was rescinded July 30, 1997.

10 CSR 10-5.060, "Refuse Note to be Burned in Fuel Burning Installations" has been rescinded by the State.

10 CSR 10-5.090, "Restriction of Emission of Visible Air Contaminants" has been rescinded by the State.

### **Construction Permit Revisions**

The following revisions were made to construction permits for this installation:

- 1) Construction Permit No. 01780 (St. Louis County Air Pollution Control Operating Permit 5771) language was changed to coincide with the language in the rules. The limitations were not changed.
- 2) Construction Permit No. 6280 (St. Louis County Air Pollution Control Operating Permit 6208) language was changed to coincide with the language in the rules. The limitations were not changed.

### **NSPS Applicability**

Subpart Dc "Small Industrial – Commercial – Institutional Steam Generating Units" the facility's boilers (10 – 100 MMBTU/hr) have not been modified, constructed or reconstructed after 06/09/89.

Subpart Ea "Municipal Waste Combustors" the two (2) refuse-fired boilers have been removed.

Subpart K and Ka "Storage Vessels for Petroleum Liquids after June 11, 1973" and "Storage Vessels for Petroleum Liquids" there are no "petroleum liquid" storage tanks with the capacity greater than 40,000 gallons (Fuel oils nos. 2 through 6 and diesel fuel nos. 2-D and 4-D are exempt from the definition of "Petroleum Liquids").

### **MACT Applicability**

None

### **NESHAP Applicability**

Subpart I was rescinded by the US EPA.

### **Other Regulatory Determinations**

10 CSR 10-5.130, "Certain Coals To Be Washed", the facility does not import, sell, offer for sale, expose for sale, exchange, deliver or transport for use and consumption coal.

10 CSR 10-5.240, "Additional Air Quality Control Measures May be Required When Sources are Clustered in a Small Land Area" facility is not located in a small land area as defined by the rule.

10 CSR 10-5.370, "Control of Emissions from the Application of Deadeners and Adhesives", the facility is not an automotive manufacturer as required to be subject to the rule.

10 CSR 10-5.430, "Control of Emissions From the Surface Coating of Chrome-Plated and Resist Plastic Parts", this rule only applies to the Seigel-Robert Plating Company located in South St. Louis.

10 CSR 10-5.455, "Control of Emission from Solvent Cleanup Operation", the facility emits less than 500 lbs. per day of VOCs from any non-exempt solvent cleanup operations.

10 CSR 10-5.500, "Control of Emissions from Volatile Organic Liquid Storage", all storage vessels that meet the requirements of this rule are either subject to or exempt from the requirements of 40 CFR parts 60, 61, or 63 and are exempt from this rule.

10 CSR 10-5.520, "Control of Volatile Organic Compound Emissions From Existing Major Sources", does not apply to this facility because the facility is subject to one or more rules under Title 10, Chapter 5 or the *Code of State Regulations* (CSR) applies to volatile organic compound (VOC) emissions from a product process, or a raw material, intermediate or product tank.

10 CSR 10-5.540, "Control of Emissions From Batch Process Operations", the facility does not operate any batch operations which meets the requirement of a potential to emit a 100 tons/year of Volatile Organic Compounds nor do they have any operations within the SIC codes listed in the rule.

10 CSR 10-6.100, "Alternate Emission Limits", the facility has not proposed any alternate ways of meeting VOC emission limits required in 10 CSR 10-5.

10 CSR 10-6.270, "Acid Rain Source Permits Required" facility coal fired power plant is not a producer of electricity and thus, is not in a source category requiring an acid rain permit.

**Other Regulations Not Cited in the Operating Permit or the Above Statement of Basis**

Any regulation which is not specifically listed in either the Operating Permit or in the above Statement of Basis does not appear, based on this review, to be an applicable requirement for this installation for one (1) or more of the following reasons:

1. The specific pollutant regulated by that rule is not emitted by the installation;
2. The installation is not in the source category regulated by that rule;
3. The installation is not in the county or specific area that is regulated under the authority of that rule;
4. The installation does not contain the type of emission unit which is regulated by that rule;
5. The rule is only for administrative purposes.

Should a later determination conclude that the installation is subject to one (1) or more of the regulations cited in this Statement of Basis or other regulations which were not cited, the installation shall determine and demonstrate, to the APCP's satisfaction, the installation's compliance with that regulation(s). If the installation is not in compliance with a regulation which was not previously cited, the installation shall submit to the APCP a schedule for achieving compliance for that regulation(s).

Prepared by:

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Kathrina Donegan  
Environmental Engineer

